

PART 70 OPERATING PERMIT OFFICE OF AIR MANAGEMENT

**Rieter Automotive North America, Inc.
101 West Oakley Avenue
Lowell, Indiana 46356-2206**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T089-6629-00013	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date:

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Natural Gas Fired Boiler Certification

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Quarterly Compliance Monitoring Report Form

SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary automotive sound deadening products manufacturing operation.

Responsible Official: Jeff Windlow
Source Address: 101 West Oakley Street, Lowell, Indiana 46356-2206
Mailing Address: 101 West Oakley Street, Lowell, Indiana 46356-2206
Phone Number: 219-696-5100
SIC Code: 3714
County Location: Lake
County Status: Severe Nonattainment Area for Ozone
Attainment for all other Criteria Pollutants
Source Status: Part 70 Permit Program
Major Source under PSD Rules;
Major Source under Emission Offset Rules;
Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (1) One (1) hot molding department, identified as HMD, constructed prior to 1978, with a maximum capacity of 2,794 pounds of trimmed parts and scrap per hour, exhausting to three (3) stacks (HV-1, HV-2, and HV-3), consisting of the following equipment:
 - (A) Nine (9) hot molding presses, known as: OTT-7, OTT-4, HAM-12, ERIE-8, HAM-11, HAM-15, OTT-1, HAM-10, and W&W-6
 - (B) Twelve (12) cooling bucks,
 - (C) Two (2) heaters in the Hot Mold Department with a combined maximum heat input capacity of 12.0 million British thermal units per hour (mmBtu/hr), each installed in 1990, identified as FCU-13 and FCU-14. This equipment is considered to be part of the Indirect Heating and Fuel Combustion Units, and
 - (D) Two (2) mold presses, identified as HETT-1 and HETT-2, each with a maximum capacity of 622 pounds of pads and 10.2 pounds of DOW films per hour, both exhausting to stack HV-1.
- (2) One (1) foam part line, identified as F.P. Line, constructed in August, 1995, with a maximum capacity of 1,277 pounds of trimmed parts and scrap per hour, exhausting to two (2) stacks (FP-1 and FP-2), consisting of the following equipment:
 - (A) One (1) electric oven with maximum throughput of 669 pounds of foam sheet and KDA damper per hour.

- (3) One (1) CJ line, identified as CJ Line, constructed in 1991, with a maximum capacity of 2,800 pounds of trimmed parts and scrap per hour, exhausting to one (1) stack (FCU-15), that can be used to mold either fully cured pad with barriers with maximum throughput of 2,791 pounds per hour or to mold foam pad with damper with maximum throughput of 1,277 pounds per hour, consisting of the following equipment:
 - (A) One (1) 2.5 million British thermal units per hour natural gas fueled CJ oven, identified as FCU-15.
- (4) Department 44, identified as D44, constructed in 1981, with a maximum capacity of 5,246 pounds of trimmed parts and scrap per hour, exhausting to one (1) stack (FCU-16), consisting of the following equipment:
 - (A) One (1) 2.5 million British thermal units per hour (mmBtu/hr) natural gas fired Line 44 Oven, identified as FCU-16, and
 - (B) One (1) 1.0 million British thermal units per hour (mmBtu/hr) natural gas fired Line 44 Oven, also identified as FCU-16.
- (5) Line 2, identified as L2, constructed in the 1970s, with a maximum capacity of 3,744 pounds of saturated felt parts and trim scrap per hour, exhausting to one (1) stack (SV-1), consisting of the following equipment:
 - (A) One (1) asphalt saturator with maximum capacity of 15,900 square feet of damper per hour,
 - (B) One (1) coater #1 using flexcryl with maximum capacity of 15,900 square feet of damper per hour and 63.6 gallons of flexcryl per hour,
 - (C) One (1) coater #2 using fuller glue with maximum capacity of 15,900 square feet of damper per hour and 31.8 gallons of fuller glue per hour, and
 - (D) One (1) 4.80 million British thermal units per hour (mmBtu/hr) natural gas fired Line 2 oil heater, installed prior to 1983, identified as FCU-10.
- (6) Lines 6 and 7, identified as L6&7, constructed in the 1960s, with a maximum capacity of 13,200 pounds of products per hour, using twelve (12) baghouses as control, exhausting to twelve (12) stacks (BH-1, BH-2, BH-3, BH-4, BH-5, BH-6, BH-7, BH-8, BH-9, BH-10, BH-11 and BH-12), consisting of the following equipment:
 - (A) One (1) 0.307 million British thermal units per hour natural gas fired predryer infrared oven,
 - (B) One (1) reverse roll coater with maximum capacity of 21,750 square feet of barrier and damper sheet (filled asphaltic sheet) per hour, Line 6
 - (C) One (1) bag dump station with baghouse BH-12,
 - (D) Nine (9) pneumatically loaded silos (#9 - #17), with a combined capacity of 46,945 pounds per hour,
 - (E) One (1) vacuum receiver, maximum throughput 108 pounds per hour, Line 6
 - (F) One (1) bag dump station, containing calcium oxide, with baghouse BH-11
 - (G) Two (2) reverse roll coaters, with maximum capacity of 13,050 square feet of barrier sheet (filled asphaltic sheet) per hour each, Line 7
 - (H) One (1) 4.80 million British thermal units per hour (mmBtu/hr) natural gas fired Lines 6 & 7 oil heater, installed prior to 1983, identified as FCU-11.

- (7) Line 8, identified as L8, constructed in 1989, with a maximum capacity of 14,000 pounds of products per hour, using thirteen (13) baghouses as control, exhausting to thirteen (13) stacks (BH-13, BH-14, BH-15, BH-16, BH-17, BH-18, BH-19, BH-20, BH-21, BH-22, BH-23, BH-24 and BH-25), consisting of the following equipment:
- (A) Two (2) bag dump stations:
 - (1) One (1) bag dump station (Bag Fill), capacity 4,000 pounds per hour,
 - (2) One (1) bag dump station (Calcium Oxide), capacity 108 pounds per hour,
 - (B) One (1) vacuum receiver, capacity 108 pounds per hour,
 - (C) Ten (10) storage silos with combined capacity of 53,914 pounds per hour,
 - (D) Two (2) reverse roll coaters, with maximum capacity of 36,000 square feet of barrier and damper sheet (filled asphaltic sheet) per hour each,
 - (E) One (1) 6.00 million British thermal units per hour (mmBtu/hr) natural gas fired Line 8 oil heater, installed in 1991, identified as FCU-12.
- (8) Line 92, identified as L92, constructed in 1966, with a maximum capacity of 3,280 pounds of products per hour, using three (3) baghouses and one (1) thermal oxidizer as control, exhausting to one (1) stack (FCU-4), consisting of the following equipment:
- (A) One (1) fiberglass receiver, maximum capacity of 1,800 pounds per hour,
 - (B) One (1) fiberglass opener,
 - (C) Four (4) virgin cotton fiber bale breakers, maximum capacity of 2,000 pounds per hour each,
 - (D) One (1) conveyor, maximum capacity of 6,000 pounds per hour,
 - (E) One (1) fiber blender opener, maximum capacity of 6,000 pounds per hour,
 - (F) One (1) rotoblender, maximum capacity of 6,000 pounds per hour,
 - (G) One (1) feed hopper,
 - (H) One (1) air lay,
 - (I) One (1) reclaim screen,
 - (J) One (1) classifier,
 - (K) One (1) picker,
 - (L) One (1) resin distributor,
 - (M) One (1) 17.85 million British thermal units per hour natural gas fired incinerator,
 - (N) One (1) 11.20 million British thermal units per hour (mmBtu/hr) natural gas fired Line 92 boiler, installed in 1995, identified as NAVA Oven Boiler, and
 - (O) One (1) 0.5 million British thermal units per hour (mmBtu/hr) natural gas fired Line 92 Dryer, identified as NAVA Oven.

- (9) One (1) liquid organic storage tank area, identified as VOLS, with a maximum capacity of 227,200 gallons of organic liquid, consisting of the following equipment:
- (A) One (1) fixed roof dome tank, installed in 1989, identified as Line 8 (Flux), storing asphalt, with capacity of 30,000 gallons;
 - (B) One (1) fixed roof dome tank, installed in 1989, identified as Line 8 (Coating), storing asphalt, with capacity of 30,000 gallons;
 - (C) One (1) fixed roof dome tank, installed in 1989, identified as Line 8 B-25, storing asphalt, with capacity of 30,000 gallons;
 - (D) One (1) fixed roof dome tank, installed in 1989, identified as Line 8 Latex #1, storing Latex, with capacity of 3,700 gallons;
 - (E) One (1) fixed roof dome tank, installed in 1989, identified as Line 8 Latex #2, storing Latex, with capacity of 3,700 gallons;
 - (F) One (1) fixed roof dome tank, installed prior to 1970, identified as Process Oil, storing Process Oil, with capacity of 13,500 gallons;
 - (G) One (1) fixed roof dome tank, installed in 1990, identified as Antifreeze #1, storing Antifreeze, with capacity of 1,128 gallons;
 - (H) One (1) fixed roof dome tank, installed in 1990, identified as Antifreeze #2, storing Antifreeze, with capacity of 1,128 gallons;
 - (I) One (1) fixed roof dome tank, installed in 1976, identified as Line 6 & 7 (Flux), storing asphalt, with capacity of 30,455 gallons;
 - (J) One (1) fixed roof dome tank, installed in 1976, identified as Line 6 & 7 (Coating), storing asphalt, with capacity of 30,455 gallons;
 - (K) One (1) fixed roof dome tank, installed in 1976, identified as Line 6 & 7 B-25, storing asphalt, with capacity of 30,455 gallons;
 - (L) One (1) fixed roof dome tank, installed in 1986, identified as Waste Oil, storing Waste Oil, with capacity of 2,970 gallons;
 - (M) One (1) fixed roof dome tank, installed in 1990, identified as HT Oil, storing Heat Transfer Oil, with capacity of 1,128 gallons;
 - (N) One (1) fixed roof dome tank, installed in 1990, identified as Lube Oil, storing Lube Oil, with capacity of 1,128 gallons;
 - (O) One (1) fixed roof dome tank, installed in 1976, identified as Line 6 & 7 Latex, storing Latex, with capacity of 3,700 gallons;
 - (P) One (1) 3.0 million British thermal units per hour (mmBtu/hr) natural gas fired asphalt tank heater, identified as FCU-6;
 - (Q) One (1) 3.0 million British thermal units per hour (mmBtu/hr) natural gas fired asphalt tank heater, identified as FCU-7; and
 - (R) One (1) 3.0 million British thermal units per hour (mmBtu/hr) natural gas fired asphalt tank heater, identified as FCU-8.

- (10) Line 91, identified as L91, constructed in 1978, with a maximum capacity of 3,823 pounds of product per hour, using three (3) baghouses and one (1) thermal oxidizer as control, exhausting to one (1) stack (FCU-2)(new), consisting of the following equipment:
 - (A) One (1) existing rebuilt conventional oven (FCU-1) rated at 9 million British thermal units per hour (mmBtu/hr) connected through new modified duct work to a new thermal oxidizer rated at 15 million British thermal units per hour (mmBtu/hr), using a low NOx burner as control, exhausting to one (1) stack (FCU-2 (new)).
 - (B) Four (4) bale breakers;
 - (C) One (1) feed hopper.
 - (D) One (1) fiber opener,
 - (E) One (1) airway,
 - (F) One (1) classifier,
 - (G) One (1) reclaim screen,
 - (H) One (1) picker,
 - (I) One (1) resin distributor, and
 - (J) Two (2) aspirator tables.
- (11) One (1) foam part cell, identified as Foam Cell Injection Molding, under construction 1997/1998, with a maximum capacity of 4,273.1 pounds of trimmed parts and scrap per hour, consisting of the following equipment:
 - (A) Two (2) chemical storage tanks, 8,000 gallon capacity each,
 - (B) One (1) metering system,
 - (C) One (1) robotic injector, and
 - (D) One (1) nitrogen blank system for chemical storage tanks.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (1) One (1) 8.38 million British thermal units per hour (mmBtu/hr) natural gas fired boiler, installed prior to 1983, identified as FCU-5;
- (2) VOC and HAP storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than or equal to 12,000 gallons.
- (3) Fifty-two (52) natural gas fired space heaters and four (4) air makeup units with a combined maximum heat input capacity of 54.75 million British thermal units per hour (mmBtu/hr), each with individual heat capacities less than ten (10) million British thermal units. This equipment is considered to be part of the Direct Heating and Fuel Combustion Units,
- (4) VOC and HAP vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids,

- (5) Application of oils, greases, lubricants, or other nonvolatile materials applied as temporary protective coatings,
- (6) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment,
- (7) Closed loop heating and cooling systems,
- (8) Water based adhesives that are less than or equal to 5% by volume of VOC's excluding HAPs,
- (9) Replacement of repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment,
- (10) Paved and unpaved roads and parking lots with public access,
- (11) Blowdown for any of the following: sight glass, boiler, compressors, pumps, and cooling towers,
- (12) A laboratory as defined in 326 IAC 2-7-1(21)(D),
- (13) One (1) 200 horsepower primary fire pump, fueled by #1 diesel fuel and one (1) 285 gallon fuel tank, and
- (14) One (1) 110 horsepower emergency fire pump, fueled by #1 diesel fuel and one (1) 275 gallon fuel tank.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22); and
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

- (a) Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7.
- (b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled "Permit Shield."

B.2 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2 and 326 IAC 2-7 shall prevail.

B.3 Permit Term [326 IAC 2-7-5(2)]

This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

B.4 Enforceability [326 IAC 2-7-7(a)]

- | | |
|-----|---|
| (a) | All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM. |
| (b) | Unless otherwise stated, terms and conditions of this permit, including any provisions to limit the source's potential to emit, are enforceable by the United States Environmental Protection Agency (U.S. EPA) and citizens under the Clean Air Act. |

B.5 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.6 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall furnish to IDEM, OAM, within a reasonable time, any information that IDEM, OAM, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.

- (c) Upon request, the Permittee shall also furnish to IDEM, OAM copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAM along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit constitutes a violation of the Clean Air Act and is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; or
 - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year (the first report shall cover the time period from the date of issuance of the Part 70 Permit to December 31), and shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was based on continuous or intermittent data;
 - (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3);
 - (5) Any insignificant activity that has been added without a permit revision;
 - (6) Such other facts, as specified in Sections D of this permit, as IDEM, OAM may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.12 Preventive Maintenance Plan [326 IAC IAC 2-7-5(1),(3) and (13)] [326 IAC IAC 2-7-6(1) and (6)]
[326 IAC IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM.

B.13 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-888-209-8892 (ask for Office of Air Management, Compliance Section), or
Telephone Number: 219-881-6712 (ask for Compliance Section)
Facsimile Number: 219-881-6745
 - (5) For each emergency lasting one (1) hour or more, the Permittee submitted notice, either in writing or facsimile, of the emergency to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:
 - (A) A description of the emergency;
 - (B) Any steps taken to mitigate the emissions; and
 - (C) Corrective actions taken.The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
 - (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAM, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(10) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAM, by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.14 Permit Shield [326 IAC IAC 2-7-15]

- (a) This condition provides a permit shield as addressed in 326 IAC IAC 2-7-15.
- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:
 - (1) The applicable requirements are included and specifically identified in this permit; or
 - (2) The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.
- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application.

- (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM has issued the modification. [326 IAC 2-7-12(b)(7)]

B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation.

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
 - (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
 - (2) An emergency as defined in 326 IAC 2-7-1(12); or
 - (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
 - (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)]
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM, determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAM, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.18 Permit Renewal [326 IAC 2-7-4]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
 - (1) A timely renewal application is one that is:
 - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (2) If IDEM, OAM, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAM, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAM, any additional information identified as being needed to process the application.
- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAM, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

**B.20 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)]
[326 IAC 2-7-12 (b)(2)]**

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

- (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.21 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(b)]

The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:

- (a) For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.
- (b) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).

B.22 Operational Flexibility [326 IAC 2-7-20]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-1 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAM, in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

- (b) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:
 - (1) A brief description of the change within the source;
 - (2) The date on which the change will occur;
 - (3) Any change in emissions; and
 - (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAM, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.23 Construction Permit Requirement [326 IAC 2]

Except as allowed by Indiana P.L. 130-1996 Section 12, as amended by P.L. 244-1997, modification, construction, or reconstruction shall be approved as required by and in accordance with 326 IAC 2.

B.24 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

[326 IAC 2-7-6(6)]

- (1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAM nor an authorized representative, may disclose the information unless and until IDEM, OAM makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]
- (2) The Permittee, and IDEM, OAM acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

B.25 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.26 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAM the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

C.1 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six minute averaging period, as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.2 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3(a)(2)(A) and (B) are not federally enforceable.

C.3 Incineration [326 IAC 4-2][326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. This condition is not federally enforceable.

C.4 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.5 Operation of Equipment [326 IAC 2-7-6(6)]

All air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.6 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;

- (B) Removal or demolition contractor; or
- (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) Procedures for Asbestos Emission Control
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.7 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.8 Compliance Schedule [326 IAC 2-7-6(3)]

The Permittee:

- (a) Has certified that all facilities at this source are in compliance with all applicable requirements; and
- (b) Has submitted a statement that the Permittee will continue to comply with such requirements; and
- (c) Will comply with such applicable requirements that become effective during the term of this permit.

C.9 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee may extend the compliance schedule an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.10 Maintenance of Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

- (a) In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour until such time as the continuous monitor is back in operation.
- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.11 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the applicable requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

C.12 Pressure Gauge or Temperature Gauge Specifications

Whenever a condition in this permit requires the measurement of pressure drop or temperature across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

- (b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ninety (90) days after the date of issuance of this permit.

The ERP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) If the ERP is disapproved by IDEM, OAM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAM, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

- (a) Submit:
- (1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
 - (2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
 - (3) A verification to IDEM, OAM, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.

- (b) Provide annual certification to IDEM, OAM, that the Risk Management Plan is being properly implemented.

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.15 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]
[326 IAC 1-6]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
 - (1) This condition;
 - (2) The Compliance Determination Requirements in Section D of this permit;
 - (3) The Compliance Monitoring Requirements in Section D of this permit;
 - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
 - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :
 - (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
 - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
 - (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;
 - (3) An automatic measurement was taken when the process was not operating; or

- (4) The process has already returned to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

**C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
[326 IAC 2-7-6]**

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
 - (1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
 - (2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

C.18 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]

- (a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.19 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC IAC 2-7-6]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM representative, for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner (or local agency) makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or local agency within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
 - (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.

- (c) Support information shall include, where applicable:
 - (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.20 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported. The Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period. The reports do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports. The Emergency/Deviation Occurrence Report does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.

- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

Stratospheric Ozone Protection

C.21 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- (1) One (1) hot molding department, identified as HMD, constructed prior to 1978, with a maximum capacity of 2,794 pounds of trimmed parts and scrap per hour, exhausting to three (3) stacks (HV-1, HV-2, and HV-3), consisting of the following equipment:
 - (A) Nine (9) hot molding presses, known as: OTT-7, OTT-4, HAM-12, ERIE-8, HAM-11, HAM-15, OTT-1, HAM-10, and W&W-6
 - (B) Twelve (12) cooling bucks, and
 - (C) Two (2) heaters in the Hot Mold Department with a combined maximum heat input capacity of 12.0 million British thermal units per hour (mmBtu/hr), each installed in 1990, identified as FCU-13 and FCU-14. This equipment is considered to be part of the Indirect Heating and Fuel Combustion Units.
 - (D) Two (2) mold presses, identified as HETT-1 and HETT-22, each with a maximum capacity of 622 pounds of pads and 10.2 pounds of DOW films per hour, both exhausting to stack HV-1.
- (2) One (1) foam part line, identified as F.P. Line, constructed in August, 1995, with a maximum capacity of 1,277 pounds of trimmed parts and scrap per hour, exhausting to two (2) stacks (FP-1 and FP-2), consisting of the following equipment:
 - (A) One (1) electric oven with maximum throughput of 669 pounds of foam sheet and KDA damper per hour.
- (3) One (1) CJ line, identified as CJ Line, constructed in 1991, with a maximum capacity of 2,800 pounds of trimmed parts and scrap per hour, exhausting to one (1) stack (FCU-15), that can be used to mold either fully cured pad with barriers with maximum throughput of 2,791 pounds per hour or to mold foam pad with damper with maximum throughput of 1,277 pounds per hour, consisting of the following equipment:
 - (A) One (1) 2.5 million British thermal units per hour natural gas fueled CJ oven identified as FCU-15, and
- (4) Department 44, identified as D44, constructed in 1981, with a maximum capacity of 5,246 pounds of trimmed parts and scrap per hour, exhausting to one (1) stack (FCU-16), consisting of the following equipment:
 - (A) One (1) 2.5 million British thermal units per hour (mmBtu/hr) natural gas fired Line 44 Oven, identified as FCU-16, and
 - (B) One (1) 1.0 million British thermal units per hour (mmBtu/hr) natural gas fired Line 44 Oven, also identified as FCU-16.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Particulate Matter (PM) [326 IAC 6-1-2(a)]

Pursuant to 326 IAC 6-1-2(a) (Particulate Emission Limitations):

- (A) The PM from the one (1) hot molding department shall not exceed 0.03 grains per dry standard cubic foot. See the following table for the equivalent pound per hour emissions:

Emission Units/Stack	Flow Rate (acfm)	326 IAC 6-1-2(a) limitation (gr/dscf)	Equivalent limit in pounds per hour
HMP-4, HMP-5, HMP-6, HMP-7 / HV-2	70,467	0.03	18.12
HMP-1, HMP-2, HMP-3, HETT-1, HETT-2 / HV-1	22,076	0.03	5.67
HMP-8, HMP-9 / HV-3	54,083	0.03	13.90

- (B) The PM from the one (1) foam part line shall not exceed 0.03 grains per dry standard cubic foot. See the following table for the equivalent pound per hour emissions:

Emission Units/Stack	Flow Rate (acfm)	326 IAC 6-1-2(a) limitation (gr/dscf)	Equivalent limit in pounds per hour
Electric Oven / FP-1	4,000	0.03	1.02
Electric Oven / FP-2	4,000	0.03	1.02

- (C) The PM from the one (1) CJ Line shall not exceed 0.03 grains per dry standard cubic foot. See the following table for the equivalent pound per hour emissions:

Emission Units/Stack	Flow Rate (acfm)	326 IAC 6-1-2(a) limitation (gr/dscf)	Equivalent limit in pounds per hour
CJ Oven / FCU-15	4,000	0.03	1.02

- (D) The PM from Department 44 shall not exceed 0.03 grains per dry standard cubic foot. See the following table for the equivalent pound per hour emissions:

Emission Units/Stack	Flow Rate (acfm)	326 IAC 6-1-2(a) limitation (gr/dscf)	Equivalent limit in pounds per hour
Line 44 Oven / FCU-16	1,000	0.03	0.25

D.1.2 Particulate Matter (PM) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Emission Limitations for Facilities specified in 326 IAC 6-2-1(c)), the particulate matter emissions from the two (2) natural gas fired heaters with combined heat input capacity 12.0 mmBtu/hr are limited to 0.45 pounds per million British thermal units per hour (lb/mmBtu).

This limitation is based on the following equation:

$$Pt = 1.09 / Q^{0.26}$$

Where:

Pt = Pounds of particulate matter emitted per million Btu heat input (lb/mmBtu).

Q = Total source maximum operating capacity rating in million Btu per hour (mmBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's operation permit application, except when some lower capacity is contained in the facility's operation permit; in which case the capacity specified in the operation permit shall be used.

Compliance Determination Requirements

D.1.3 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the Particulate Matter (PM) limits specified in Conditions D.1.1 and D.1.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.4 Monitoring

Monitoring of these facilities is not specifically required by this permit. However, any change or modification to these facilities as specified in 326 IAC 2-1, may require this facility to have monitoring requirements.

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- (5) Line 2, identified as L2, constructed in the 1970s, with a maximum capacity of 3,744 pounds of saturated felt parts and trim scrap per hour, exhausting to one (1) stack (SV-1), consisting of the following equipment:
- (A) One (1) asphalt saturator with maximum capacity of 15,900 square feet of damper per hour,
 - (B) One (1) coater #1 using flexcryl with maximum capacity of 15,900 square feet of damper per hour and 63.6 gallons of flexcryl per hour,
 - (C) One (1) coater #2 using fuller glue with maximum capacity of 15,900 square feet of damper per hour and 31.8 gallons of fuller glue per hour,
 - (D) One (1) 4.80 million British thermal units per hour (mmBtu/hr) natural gas fired Line 2 oil heater, installed prior to 1983, identified as FCU-10.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Particulate Matter (PM) [326 IAC 6-1-2(a)]

Pursuant to 326 IAC 6-1-2(a) (Particulate Emission Limitations), the PM from Line 2 shall not exceed 0.03 grains per dry standard cubic foot. See the following table for the equivalent pound per hour emissions:

Emission Units/Stack	Flow Rate (acfm)	326 IAC 6-1-2(a) limitation (gr/dscf)	Equivalent limit in pounds per hour
Line 2 Asphalt Saturator / SV-1	2,760	0.03	0.70

D.2.2 Particulate Matter (PM) [326 IAC 6-2-2]

Pursuant to 326 IAC 6-2-2 (Emission Limitations for Facilities Specified in 326 IAC 6-2-1(a)), the particulate matter emissions from the one (1) 4.8 mmBtu/hr natural gas fired Line 2 oil heater shall be limited to 0.54 pounds particulate matter per million British thermal unit (lb/mmBtu).

This limit is based on the following equation:

$$Pt = 0.87 / Q^{0.16}$$

Where:

Pt = Pounds of particulate matter emitted per million Btu heat input (lb/mmBtu).

Q = Total source maximum operating capacity rating in million Btu per hour (mmBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's operation permit application, except when some lower capacity is contained in the facility's operation permit; in which case the capacity specified in the operation permit shall be used.

D.2.3 Volatile Organic Compound (VOC) [326 IAC 8-2-11]

Pursuant to 326 IAC 8-2-11 (Fabric and Vinyl Coating Operations), no owner or operator of a facility engaged in the surface coating of fabric or vinyl may cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds in excess of 2.9 pounds of VOC per gallon of coating excluding water, delivered to coating applicator when coating fabric and 4.8 pounds of VOC per gallon of coating excluding water, delivered to the coating applicator when coating vinyl.

Compliance Determination Requirements

D.2.4 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the Particulate Matter (PM) and Volatile Organic Compound (VOC) limits specified in Conditions D.2.1 and D.2.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.2.5 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Condition D.2.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.6 Monitoring

Monitoring of these facilities is not specifically required by this permit. However, any change or modification to these facilities as specified in 326 IAC 2-1, may require this facility to have monitoring requirements.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.7 Record Keeping Requirements

- (a) To document compliance with Condition D.2.3, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.2.3.
 - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

When non-compliant coatings are used, the following records shall be kept:

- (2) A log of the dates of use;
 - (3) The volume weighted VOC content of the coatings used for each day;
 - (4) The total VOC usage for each month; and
 - (5) The weight of VOCs emitted for each compliance period.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.3

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- (6) Lines 6 and 7, identified as L6&7, constructed in the 1960s, with a maximum capacity of 13,200 pounds of products per hour, using twelve (12) baghouses as control, exhausting to twelve (12) stacks (BH-1, BH-2, BH-3, BH-4, BH-5, BH-6, BH-7, BH-8, BH-9, BH-10, BH-11 and BH-12), consisting of the following equipment:
- (A) One (1) 0.307 million British thermal units per hour natural gas fired predryer infrared oven,
 - (B) One (1) reverse roll coater with maximum capacity of 21,750 square feet of barrier and damper sheet (filled asphaltic sheet) per hour, Line 6,
 - (C) One (1) bag dump station with baghouse BH-12,
 - (D) Nine (9) pneumatically loaded silos (#9 - #17), with a combined capacity of 46,945 pounds per hour,
 - (E) One (1) vacuum receiver, maximum throughput 108 pounds per hour, Line 6,
 - (F) One (1) bag dump station, containing calcium oxide, with baghouse BH-11,
 - (G) Two (2) reverse roll coaters, with maximum capacity of 13,050 square feet of barrier sheet (filled asphaltic sheet) per hour each, Line 7,
 - (H) One (1) 4.80 million British thermal units per hour (mmBtu/hr) natural gas fired Lines 6 & 7 oil heater, installed prior to 1983, identified as FCU-11.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Particulate Matter (PM) [326 IAC 6-1-2(a)]

Pursuant to 326 IAC 6-1-2(a) (Particulate Emissions Limitations), the PM from the bulk handling operations in Lines 6 & 7 shall not exceed 0.03 grains per dry standard cubic foot. See the following table for the equivalent pound per hour emissions:

Emission Units/Stack	Flow Rate (acfm)	326 IAC 6-1-2(a) limitation (gr/dscf)	Equivalent limit in pounds per hour
Bag Fill / BH-1	600	0.03	0.15
Bag Fill / BH-2	600	0.03	0.15
Bag Fill / BH-3	600	0.03	0.15
Bag Fill / BH-4	600	0.03	0.15
Truck Fill / BH-5	600	0.03	0.15
Truck Fill / BH-6	600	0.03	0.15
Truck Fill / BH-7	600	0.03	0.15
Truck Fill / BH-8	600	0.03	0.15
Truck Fill / BH-9	600	0.03	0.15
Vacuum Receiver / BH-10	600	0.03	0.15
Bag Dump Station / BH-11	1,000	0.03	0.25
Bag Dump Station / BH-12	1,000	0.03	0.25

D.3.2 Particulate Matter (PM) [326 IAC 6-2-2]

Pursuant to 326 IAC 6-2-2 (Emission Limitations for Facilities Specified in 326 IAC 6-2-1(a)), the particulate matter emissions from the one (1) 4.8 mmBtu/hr natural gas fired Lines 6 & 7 oil heater shall be limited to 0.54 pounds particulate matter per million British thermal unit (lb/mmBtu). This limit is based on the following equation:

$$Pt = 0.87 / Q^{0.16}$$

Where:

Pt = Pounds of particulate matter emitted per million Btu heat input (lb/mmBtu).

Q = Total source maximum operating capacity rating in million Btu per hour (mmBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's operation permit application, except when some lower capacity is contained in the facility's operation permit; in which case the capacity specified in the operation permit shall be used.

D.3.3 Volatile Organic Compounds [326 IAC 8-2-5]

Pursuant to 326 IAC 8-2-5 (Paper Coating Operations), no owner or operator of a facility engaged in the surface coating of paper may cause, allow or permit the discharge into the atmosphere of any volatile organic compounds in excess of 2.9 pounds of VOC per gallon of coating excluding water, delivered to the two (2) reverse rollcoaters.

Compliance Determination Requirements

D.3.4 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the Particulate Matter (PM) and Volatile Organic Compound (VOC) limits specified in Conditions D.3.1, D.3.2 and D.3.3 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.3.5 Particulate Matter (PM)

Pursuant to 326 IAC 6-1-2(a) (Particulate Emissions Limitations), the twelve (12) baghouses for PM control shall be in operation at all times when the bulk handling operations in Lines 6 & 7 are in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.3.6 Monitoring

Monitoring of these facilities is not required by this permit. However, any change or modification to these facilities, as specified in 326 IAC 2-1 may require these facilities to have monitoring requirements.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.3.7 Record Keeping Requirements

- (a) To document compliance with Condition D.3.3, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.3.3.

- (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

When non-compliant coatings are used, the following records shall be kept:

- (2) A log of the dates of use;
 - (3) The volume weighted VOC content of the coatings used for each day;
 - (4) The total VOC usage for each month; and
 - (5) The weight of VOCs emitted for each compliance period.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.4 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- (7) Line 8, identified as L8, constructed in 1989, with a maximum capacity of 14,000 pounds of products per hour, using thirteen (13) baghouses as control, exhausting to thirteen (13) stacks (BH-13, BH-14, BH-15, BH-16, BH-17, BH-18, BH-19, BH-20, BH-21, BH-22, BH-23, BH-24 and BH-25), consisting of the following equipment:
- (A) Two (2) bag dump stations:
 - (1) One (1) bag dump station (Bag Fill), capacity 4,000 pounds per hour,
 - (2) One (1) bag dump station (Calcium Oxide), capacity 108 pounds per hour,
 - (B) One (1) vacuum receiver, capacity 108 pounds per hour,
 - (C) Ten (10) storage silos with combined capacity of 53,914 pounds per hour,
 - (D) Two (2) reverse roll coaters, capacity of 36,000 square feet of barrier and damper sheet (filled asphaltic sheet) per hour each,
 - (E) One (1) 6.00 million British thermal units per hour (mmBtu/hr) natural gas fired Line 8 oil heater, installed in 1991, identified as FCU-12.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 Particulate Matter (PM) [326 IAC 6-1-2(a)]

Pursuant to 326 IAC 6-1-2(a) (Particulate Emissions Limitations), the PM from the granular material handling operations in Line 8 shall not exceed 0.03 grains per dry standard cubic foot. See the following table for the equivalent pound per hour emissions:

Emission Units/Stack	Flow Rate (acfm)	326 IAC 6-1-2(a) limitation (gr/dscf)	Equivalent limit in pounds per hour
Bag Fill / BH-13	600	0.03	0.15
Bag Fill / BH-14	600	0.03	0.15
Bag Fill / BH-15	600	0.03	0.15
Bag Fill / BH-16	600	0.03	0.15
Bag Fill / BH-17	600	0.03	0.15
Truck Fill / BH-18	600	0.03	0.15
Truck Fill / BH-19	600	0.03	0.15
Truck Fill / BH-20	600	0.03	0.15
Truck Fill / BH-21	600	0.03	0.15
Truck Fill / BH-22	600	0.03	0.15
Bag Dump Station / BH-23	1,000	0.03	0.25
Vacuum Receiver / BH-24	600	0.03	0.15
Bag Dump Station / BH-25	1,000	0.03	0.25

D.4.2 Particulate Matter (PM) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Emission Limitations for Facilities specified in 326 IAC 6-2-1(c)), the particulate matter emissions from the one (1) 6.0 mmBtu/hr natural gas fired Line 8 oil heater is limited to 0.42 pounds per million British thermal units per hour (lb/mmBtu).

This limitation is based on the following equation:

$$P_t = 1.09 / Q^{0.26}$$

Where:

P_t = Pounds of particulate matter emitted per million Btu heat input (lb/mmBtu).

Q = Total source maximum operating capacity rating in million Btu per hour (mmBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's operation permit application, except when some lower capacity is contained in the facility's operation permit; in which case the capacity specified in the operation permit shall be used.

D.4.3 Volatile Organic Compound (VOC) [326 IAC 8-2-5]

Pursuant to 326 IAC 8-2-5 (Paper Coating Operations), no owner or operator of a facility engaged in the surface coating of paper may cause, allow or permit the discharge into the atmosphere of any volatile organic compounds in excess of 2.9 pounds of VOC per gallon of coating excluding water, delivered to the two (2) reverse rollcoaters.

Compliance Determination Requirements

D.4.4 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the Particulate Matter (PM) and Volatile Organic Compound (VOC) limits specified in Conditions D.4.1, D.4.2 and D.4.3 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.4.5 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Condition D.4.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.4.6 Particulate Matter (PM)

Pursuant to 326 IAC 6-1-2(a) (Particulate Emission Limitations), the thirteen (13) baghouses for PM control shall be in operation at all times when the granular material handling operations in Line 8 are in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.4.7 Monitoring

Monitoring of these facilities is not required by this permit. However, any change or modification to these facilities, as specified in 326 IAC 2-1 may require these facilities to have monitoring requirements.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.4.8 Record Keeping Requirements

- (a) To document compliance with Condition D.4.3, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.4.3.

- (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

When non-compliant coatings are used, the following records shall be kept:

- (2) A log of the dates of use;
 - (3) The volume weighted VOC content of the coatings used for each day;
 - (4) The total VOC usage for each month; and
 - (5) The weight of VOCs emitted for each compliance period.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.5 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- (8) Line 92, identified as L92, constructed in 1966, with a maximum capacity of 3,280 pounds of products per hour, using three (3) baghouses and one (1) thermal oxidizer as control, exhausting to one (1) stack (FCU-4), consisting of the following equipment:
- (A) One (1) fiberglass receiver, maximum capacity of 1,800 pounds per hour,
 - (B) One (1) fiberglass opener,
 - (C) Four (4) virgin cotton fiber bale breakers, maximum capacity of 2,000 pounds per hour each,
 - (D) One (1) conveyor, maximum capacity of 6,000 pounds per hour,
 - (E) One (1) fiber blender opener, maximum capacity of 6,000 pounds per hour,
 - (F) One (1) rotoblender, maximum capacity of 6,000 pounds per hour,
 - (G) One (1) feed hopper,
 - (H) One (1) air lay,
 - (I) One (1) reclaim screen,
 - (J) One (1) classifier,
 - (K) One (1) picker,
 - (L) One (1) resin distributor
 - (M) One (1) 17.85 million British thermal units per hour natural gas fired incinerator,
 - (N) One (1) 11.20 million British thermal units per hour (mmBtu/hr) natural gas fired Line 92 boiler, installed in 1995, identified as NAVA Oven Boiler, and
 - (O) One (1) 0.5 million British thermal units per hour (mmBtu/hr) natural gas fired Line 92 Dryer, identified as NAVA Oven.
- (10) Line 91, identified as L91, constructed in 1978, with a maximum capacity of 3,823 pounds of product per hour, using three (3) baghouses and one (1) thermal oxidizer as control, exhausting to one (1) stack (FCU-2)(new), consisting of the following equipment:
- (A) One (1) existing rebuilt conventional oven (FCU-1) rated at 9 million British thermal units per hour (mmBtu/hr) connected through new modified duct work to a new thermal oxidizer rated at 15 million British thermal units per hour (mmBtu/hr), using a low NOx burner as control, exhausting to one (1) stack (FCU-2(new)).
 - (B) Four (4) bale breakers;
 - (C) One (1) feed hopper.
 - (D) One (1) fiber opener,
 - (E) One (1) air lay,
 - (F) One (1) classifier,
 - (G) One (1) reclaim screen,
 - (H) One (1) picker,
 - (I) One (1) resin distributor, and
 - (J) Two (2) aspirator tables.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.5.1 Volatile Organic Compound (VOC) [326 IAC 8-7]

- (a) The input of Volatile Organic Compound (VOC) to the Line 92 and the usage of cleanup solvent for the Line 92 (the usage of cleanup solvent may need to take into account any recycling of cleanup rags or reused solvent) shall be limited such that the Volatile Organic Compound (VOC) emissions from the Line 92 and Line 92 NAVA Oven shall not exceed forty-three (43) tons per year when using the thermal oxidizer with 81% overall control efficiency or the overall control efficiency determined in the stack test, whichever is lower. This overall control efficiency and input VOC limitation shall be considered RACT. This input VOC limitation ~~is~~ shall be based on the following equation:
- $$\text{VOC}_{\text{input}} = \text{VOC}_{\text{limit}} / [1 - (\text{Capture Efficiency})(\text{Destruction Efficiency})]$$

- (b) The input of Volatile Organic Compound (VOC) to the Line 91 and the usage of cleanup solvent for the Line 91 (the usage of cleanup solvent may need to take into account any recycling of cleanup rags or reused solvent) shall be limited such that the Volatile Organic Compound (VOC) emissions from the Line 91 shall not exceed forty-three (43) tons per year when using the thermal oxidizer with an 81% overall control efficiency or overall control efficiency to be determined in the stack test, whichever is lower. This overall control efficiency and input VOC limitation shall be considered RACT. The input VOC limit shall be based on the following equation:
- $$\text{VOC}_{\text{input}} = \text{VOC}_{\text{limit}} / [1 - (\text{Capture Efficiency})(\text{Destruction Efficiency})]$$

D.5.2 Particulate Matter (PM) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Emission Limitations for Facilities specified in 326 IAC 6-2-1(c)), the particulate matter emissions from the one (1) 11.2 mmBtu/hr natural gas fired Line 92 boiler is limited to 0.40 pounds per million British thermal units per hour (lb/mmBtu).

This limitation is based on the following equation:

$$\text{Pt} = 1.09 / \text{Q}^{0.26}$$

Where:

Pt = Pounds of particulate matter emitted per million Btu heat input (lb/mmBtu).

Q = Total source maximum operating capacity rating in million Btu per hour (mmBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's operation permit application, except when some lower capacity is contained in the facility's operation permit; in which case the capacity specified in the operation permit shall be used.

D.5.3 Particulate Matter (PM) [326 IAC 6-1-2(a)]

Pursuant to 326 IAC 6-1-2(a) (Particulate Emissions Limitations), the PM from the Line 91, Line 92, fiber prep and resin recycle shall not exceed 0.03 grains per dry standard cubic foot. See the following table for the equivalent pound per hour emissions:

Emission Units/Stack	Flow Rate (acfm)	326 IAC 6-1-2(a) limitation (gr/dscf)	Equivalent limit in pounds per hour
Line 91 / FCU-2	6,000	0.03	1.54
Line 92 / FCU-4	16,704	0.03	4.29

D.5.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and their control devices.

Compliance Determination Requirements

D.5.5 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

Within 60 days after achieving maximum production rate the Permittee shall perform VOC testing on the Line 91 thermal oxidizer and during the period between 30 and 36 months after issuance of this permit, the Permittee shall perform VOC testing on the Line 92 thermal oxidizer utilizing Method 25A and/or Method 25 or other methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. In addition to those requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

D.5.6 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Condition D.5.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating or resin manufacturer. IDEM, OAM reserves the authority to determine compliance using Method 24 or other IDEM, OAM approved method in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.5.7 VOC Emissions

Compliance with Condition D.5.1 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the most recent 12 consecutive month period.

D.5.8 Particulate Matter (PM)

Pursuant to 326 IAC 6-1-2(a) (Particulate Emissions Limitations), the three (3) baghouses for PM control on Line 91 and three (3) baghouses on Line 92 shall be in operation at all times when the Lines are in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.5.9 Thermal Incinerator [326 IAC 8-7]

- (a) Pursuant to 326 IAC 8-7 (VOC Reduction Requirements for Lake County), the one (1) 15 million British thermal units per hour (mmBtu/hr) natural gas fired thermal incinerator for the Line 91 conventional oven shall be in operation at all times when the Line 91 conventional oven is in operation. When operating, the thermal incinerator shall maintain a minimum operating temperature of 1,400°F, unless a lower temperature is determined in the compliance test provided for in Section D.5.1 (b). The temperature of the thermal oxidizer at the point of oxidation shall be continuously monitored and recorded whenever any of the facilities are in operation.
- (b) Pursuant to 326 IAC 8-7 (VOC Reduction Requirements for Lake County), the one (1) 17.85 million British thermal units per hour (mmBtu/hr) natural gas fired thermal incinerator for the NAVA oven shall be in operation at all times when NAVA oven is in operation. When operating, the thermal incinerator shall maintain a minimum operating temperature of 1,400°F, unless a lower temperature is determined in the compliance test provided for in Section D.5.1 (a). The temperature of the thermal oxidizer at the point of oxidation shall be continuously monitored and recorded whenever any of the facilities are in operation.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.5.10 Record Keeping Requirements

- (a) To document compliance with Condition D.5.9, the Permittee shall keep records of thermal incinerator temperatures from the 15 million British thermal units per hour (mmBtu/hr) Line 91 natural gas fired incinerator and the 17.85 million British thermal units per hour natural gas fired Line 92 Incinerator.
- (b) To document compliance with Condition D.5.1, the Permittee shall keep monthly records of input volatile organic compound (VOC) for the Line 92 NAVA oven and the Line 91 conventional oven.
- (c) Pursuant to 40 CFR 60.48c, the permittee shall submit notification of the date of construction, anticipated startup, and actual startup, as provided by § 60.7 of this part for the one (1) 11.2 million British thermal units per hour natural gas fired boiler in Line 92. This notification shall include:
 - (1) The design heat input capacity of the affected facility and identification of fuels to be combusted in the affected facility.

- (2) If applicable, a copy of any Federally enforceable requirement that limits the annual capacity factor for any fuel or mixture of fuels under § 60.42c, or § 60.43c.
- (3) The annual capacity factor at which the owner or operator anticipates operating the affected facility based on all fuels fired and based on each individual fuel fired.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.5.11 Reporting Requirements

- (a) An annual certification for the 11.2 million British thermal units per hour natural gas fired Line 92 boiler shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the Natural Gas Fired Boiler Certification form located at the end of this permit, or its equivalent, no later than April 15 of each year.
- (b) A quarterly summary of the information to document compliance with Condition D.5.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.6 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- (9) One (1) liquid organic storage tank area, identified as VOLS, with a maximum capacity of 227,200 gallons of organic liquid, consisting of the following equipment:
- (A) One (1) fixed roof dome tank, installed in 1989, identified as Line 8 (Flux), storing asphalt, with capacity of 30,000 gallons;
 - (B) One (1) fixed roof dome tank, installed in 1989, identified as Line 8 (Coating), storing asphalt, with capacity of 30,000 gallons;
 - (C) One (1) fixed roof dome tank, installed in 1989, identified as Line 8 B-25, storing asphalt, with capacity of 30,000 gallons;
 - (D) One (1) fixed roof dome tank, installed in 1989, identified as Line 8 Latex #1, storing Latex, with capacity of 3,700 gallons;
 - (E) One (1) fixed roof dome tank, installed in 1989, identified as Line 8 Latex #2, storing Latex, with capacity of 3,700 gallons;
 - (F) One (1) fixed roof dome tank, installed prior to 1970, identified as Process Oil, storing Process Oil, with capacity of 13,500 gallons;
 - (G) One (1) fixed roof dome tank, installed in 1990, identified as Antifreeze #1, storing Antifreeze, with capacity of 1,128 gallons;
 - (H) One (1) fixed roof dome tank, installed in 1990, identified as Antifreeze #2, storing Antifreeze, with capacity of 1,128 gallons;
 - (I) One (1) fixed roof dome tank, installed in 1976, identified as Line 6 & 7 (Flux), storing asphalt, with capacity of 30,455 gallons;
 - (J) One (1) fixed roof dome tank, installed in 1976, identified as Line 6 & 7 (Coating), storing asphalt, with capacity of 30,455 gallons;
 - (K) One (1) fixed roof dome tank, installed in 1976, identified as Line 6 & 7 B-25, storing asphalt, with capacity of 30,455 gallons;
 - (L) One (1) fixed roof dome tank, installed in 1986, identified as Waste Oil, storing Waste Oil, with capacity of 2,970 gallons;
 - (M) One (1) fixed roof dome tank, installed in 1990, identified as HT Oil, storing Heat Transfer Oil, with capacity of 1,128 gallons;
 - (N) One (1) fixed roof dome tank, installed in 1990, identified as Lube Oil, storing Lube Oil, with capacity of 1,128 gallons;
 - (O) One (1) fixed roof dome tank, installed in 1976, identified as Line 6 & 7 Latex, storing Latex, with capacity of 3,700 gallons;
 - (P) One (1) 3.0 million British thermal units per hour (mmBtu/hr) natural gas fired asphalt tank heater, identified as FCU-6;
 - (Q) One (1) 3.0 million British thermal units per hour (mmBtu/hr) natural gas fired asphalt tank heater, identified as FCU-7; and
 - (R) One (1) 3.0 million British thermal units per hour (mmBtu/hr) natural gas fired asphalt tank heater, identified as FCU-8.
- (11) One (1) foam part cell, identified as Foam Cell Injection Molding, under construction in 1997/1998, with a maximum capacity of 4,273.1 pounds of trimmed parts and scrap per hour, consisting of the following equipment:
- (A) Two (2) chemical storage tanks, 8,000 gallon capacity each,
 - (B) One (1) metering system,
 - (C) One (1) robotic injector, and
 - (D) One (1) nitrogen blank system for the chemical storage tanks.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.6.1 Volatile Organic Compound (VOC) [326 IAC 8-9]

Any change or modification to the liquid organic storage tank area or the Chemical Storage Tanks in the Foam Cell Injection Molding must be approved by the Office of Air Management (OAM) before such change or modification can occur.

Compliance Determination Requirement

D.6.2 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.6.3 Monitoring Requirements

Monitoring of this facility is not required by this permit. However, any change or modification to this facility as specified in 326 IAC 2-1 may require this facility to have monitoring requirements.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.6.4 Record Keeping Requirements

- (a) The Permittee shall keep records readily accessible of the dimension of each storage vessel and an analysis showing the capacity of each storage vessel for this life of the source for the three (3) fixed roof dome tanks, located in the liquid organic storage tank area, identified as Line 8 (Flux), Line 8 (Coating), and Line 8 B-25.
- (b) Pursuant to 326 IAC 8-9-6 (Volatile Organic Liquid Storage Vessels, Record Keeping and Reporting Requirements), the Permittee shall maintain the following records for the fifteen (15) fixed roof dome tanks and the VOC and HAP storage tanks listed in (Insignificant Activities), located in the liquid organic storage tank area for the life of the source:
 - (1) The vessel identification number.
 - (2) The vessel dimensions.
 - (3) The vessel capacity.

SECTION D.7 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]
(Insignificant Activity) One (1) 8.38 million British thermal units per hour (mmBtu/hr) natural gas fired boiler, installed prior to 1983, identified as FCU-5.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.7.1 Particulate Matter (PM) [326 IAC 6-2-2]

Pursuant to 326 IAC 6-2-2 (Emission Limitations for Facilities Specified in 326 IAC 6-2-1(a)), the particulate matter emissions from the one (1) 8.38 mmBtu/hr boiler shall be limited to 0.54 pounds particulate matter per million British thermal unit (lb/mmBtu).

This limit is based on the following equation:

$$Pt = 0.87 / Q^{0.16}$$

Where:

Pt = Pounds of particulate matter emitted per million Btu heat input (lb/mmBtu).

Q = Total source maximum operating capacity rating in million Btu per hour (mmBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's operation permit application, except when some lower capacity is contained in the facility's operation permit; in which case the capacity specified in the operation permit shall be used.

Compliance Determination Requirements

D.7.2 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the Particulate Matter (PM) limit specified in Condition D.7.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.7.3 Monitoring

Monitoring of this facility is not required by this permit. However, any change or modification to this facility as specified in 326 IAC 2-1 may require this facility to have monitoring requirements.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Rieter Automotive North America, Inc.
Source Address: 101 West Oakley Avenue, Lowell, Indiana 46356-2206
Mailing Address: 101 West Oakley Avenue, Lowell, Indiana 46356-2206
Part 70 Permit No.: T089-6629-00013

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

PART 70 OPERATING PERMIT
EMERGENCY/DEVIATION OCCURRENCE REPORT

Source Name: Rieter Automotive North American, Inc.
Source Address: 101 West Oakley Avenue, Lowell, Indiana 46356-2206
Mailing Address: 101 West Oakley Avenue, Lowell, Indiana 46356-2206
Part 70 Permit No.: T089-6629-00013

This form consists of 2 pages

Page 1 of 2

Check either No. 1 or No.2

- 9** 1. This is an emergency as defined in 326 IAC 2-7-1(12)
C The Permittee must notify the Office of Air Management (OAM), within four **(4)** business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
C The Permittee must submit notice in writing or by facsimile within two **(2)** days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
- 9** 2. This is a deviation, reportable per 326 IAC 2-7-5(3)(c)
C The Permittee must submit notice in writing within ten **(10)** calendar days

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency/Deviation:

Describe the cause of the Emergency/Deviation:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
NATURAL GAS FIRED BOILER CERTIFICATION**

Source Name: Rieter Automotive North America, Inc.
Source Address: 101 West Oakley Avenue, Lowell, Indiana 46356-2206
Mailing Address: 101 West Oakley Avenue, Lowell, Indiana 46356-2206
Part 70 Permit No.: T089-6629-00013

**This certification shall be included when submitting monitoring, testing reports/results
or other documents as required by this permit.**

Report period

Beginning: _____

Ending: _____

Boiler Affected

Alternate Fuel

Days burning alternate fuel
From To

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature: _____

Printed Name: _____

Title/Position: _____

Date: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Rieter Automotive North America, Inc.
Source Address: 101 West Oakley Avenue, Lowell, Indiana 46356-2206
Mailing Address: 101 West Oakley Avenue, Lowell, Indiana 46356-2206
Part 70 Permit No.: T089-6629-00013
Facility: Line 91 and Line 92
Parameter: VOC
Limit: 43 tons VOC per year each line

YEAR: _____

Month		Column 1	Column 2	Column 3	Column 4	[Column 1 * (1 - Column 2)] + [Column 3 * (1 - Column 4)]
		VOC Input This Month (tons)	Overall Control Efficiency (%)	VOC Input Previous 11 Months (tons)	Overall Control Efficiency (%)	VOC Emissions 12 Month Total (tons)
	Line 91					
	Line 92					
	Line 91					
	Line 92					
	Line 91					
	Line 92					

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
QUARTERLY COMPLIANCE MONITORING REPORT**

Source Name: Rieter Automotive North America, Inc.
Source Address: 101 West Oakley Avenue, Lowell, Indiana 46356-2206
Mailing Address: 101 West Oakley Avenue, Lowell, Indiana 46356-2206
Part 70 Permit No.: T089-6629-00013

Months: _____ to _____ Year: _____

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

Compliance Monitoring Requirement (e.g. Permit Condition D.1.3)	Number of Deviations	Date of each Deviation

Form Completed By: _____
Title/Position: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Management

Technical Support Document (TSD) for a Part 70 Operating Permit

Source Background and Description

Source Name: Rieter Automotive North American, Inc.
Source Location: 101 West Oakley Avenue, Lowell, Indiana 46356
County: Lake
SIC Code: 3717
Operation Permit No.: T089-6629-00013
Permit Reviewer: Cathie Moore

The Office of Air Management (OAM) has reviewed a Part 70 permit application from Rieter Automotive North American, Inc. relating to the operation of an automotive sound deadening products manufacturing operation.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (1) One (1) hot molding department, identified as HMD, constructed prior to 1978, with a maximum capacity of 2,794 pounds of trimmed parts and scrap per hour, exhausting to three (3) stacks (HV-1, HV-2, and HV-3), consisting of the following equipment:
 - (A) Nine (9) hot molding presses, known as: OTT-7, OTT-4, HAM-12, ERIE-8, HAM-11, HAM-15, OTT-1, HAM-10, and W&W-6
 - (B) Twelve (12) cooling bucks,
 - (C) One (1) carousel,
 - (D) Three (3) trim presses, and
 - (E) Two (2) heaters in the Hot Mold Department with a combined maximum heat input capacity of 12.0 million British thermal units per hour (mmBtu/hr), each installed in 1990, identified as FCU-13 and FCU-14. This equipment is considered to be part of the Indirect Heating and Fuel Combustion Units.
- (2) One (1) foam part line, identified as F.P. Line, constructed in August, 1995, with a maximum capacity of 1,277 pounds of trimmed parts and scrap per hour, exhausting to two (2) stacks (FP-1 and FP-2), consisting of the following equipment:
 - (A) One (1) electric oven with maximum throughput of 669 pounds of foam sheet and KDA damper per hour,
 - (B) One (1) heated laminator/cold mold with maximum throughput of 1,149 pounds of foam sheet and KDA damper and barrier per hour, and
 - (C) One (1) trim press with maximum throughput of 1,149 pounds of foam sheet, KDA damper and barrier per hour.

- (3) One (1) CJ line, identified as CJ Line, constructed in 1991, with a maximum capacity of 2,800 pounds of trimmed parts and scrap per hour, exhausting to one (1) stack (FCU-15), that can be used to mold either fully cured pad with barriers with maximum throughput of 2,791 pounds per hour or to mold foam pad with damper with maximum throughput of 1,277 pounds per hour, consisting of the following equipment:
 - (A) One (1) 2.5 million British thermal units per hour natural gas fueled CJ oven, and
 - (B) One (1) mold press molding fully cured pad with barrier with maximum throughput of 2,791 pounds per hour or molding foam pad with damper with maximum throughput of 1,277 pounds per hour.
- (4) Department 44, identified as D44, constructed in 1981, with a maximum capacity of 5,246 pounds of trimmed parts and scrap per hour, exhausting to one (1) stack (FCU-16), consisting of the following equipment:
 - (A) Six (6) mold presses,
 - (B) Five (5) trim presses,
 - (C) One (1) 2.5 million British thermal units per hour (mmBtu/hr) natural gas fired Line 44 Oven, identified as FCU-16, and
 - (D) One (1) 1.0 million British thermal units per hour (mmBtu/hr) natural gas fired Line 44 Oven.
- (5) Line 2, identified as L2, constructed in the 1970s, with a maximum capacity of 3,744 pounds of felt per hour, exhausting to one (1) stack (SV-1), consisting of the following equipment:
 - (A) One (1) asphalt saturator with maximum capacity of 15,900 square feet of damper per hour,
 - (B) One (1) coating line #1 using flexcryl with maximum capacity of 15,900 square feet of damper per hour and 63.6 gallons of flexcryl per hour,
 - (C) One (1) coating line #2 using fuller glue with maximum capacity of 15,900 square feet of damper per hour and 31.8 gallons of fuller glue per hour,
 - (D) One (1) 4.80 million British thermal units per hour (mmBtu/hr) natural gas fired Line 2 oil heater, installed prior to 1983, identified as FCU-10, and
 - (E) One (1) 3.4 million British thermal units per hour (mmBtu/hr) natural gas fired Line 2 asphalt heater, identified as FCU-9.
- (6) Lines 6 and 7, identified as L6&7, constructed in the 1960s, with a maximum capacity of 13,200 pounds of products per hour, using twelve (12) baghouses as control, exhausting to twelve (12) stacks (BH-1, BH-2, BH-3, BH-4, BH-5, BH-6, BH-7, BH-8, BH-9, BH-10, BH-11 and BH-12), consisting of the following equipment:
 - (A) Two (2) mixers (A & B),
 - (B) One (1) trim belt press,

- (C) One (1) 0.307 million British thermal units per hour natural gas fired predryer infrared oven,
- (D) One (1) line reverse rollcoater with maximum capacity of 21,750 square feet of barrier and damper sheet (filled asphaltic sheet) per hour,
- (E) One (1) pneumatically loaded bag dump station (#1),
- (F) One (1) pneumatically loaded silo (#9), containing: Mica, maximum throughput of 2,376 pounds per hour,
- (G) One (1) pneumatically loaded silo (#10), containing: SBS Rubber, maximum throughput of 328 pounds per hour,
- (H) One (1) pneumatically loaded silo (#11), containing: Steric Acid, maximum throughput of 99 pounds per hour,
- (I) One (1) pneumatically loaded silo (#12), containing: EVA Resin, maximum throughput of 2,574 pounds per hour,
- (J) One (1) pneumatically loaded silo (#13), containing: Clay, maximum throughput of 5,821 pounds per hour,
- (K) One (1) pneumatically loaded silo (#14), containing: Black Colorant or Barite, maximum throughput of 9,552 pounds per hour,
- (L) Two (2) pneumatically loaded silo (#15 and #16), containing: Clay, maximum throughput of 5,821 pounds per hour each,
- (M) One (1) vacuum receiver, maximum throughput 108 pounds per hour,
- (N) One (1) bag dump station, containing calcium oxide,
- (O) Two (2) weigh bins,
- (P) Two (2) holding bins,
- (Q) Two (2) mixers,
- (R) Two (2) bulk mixers,
- (S) One (1) final mixer,
- (T) Three (3) calendars,
- (U) Two (2) water tanks,
- (V) Three (3) reverse rollcoating operations, with maximum capacity of 13,050 square feet per hour each,
- (W) Two (2) trim presses,

- (X) One (1) laminator,
 - (Y) One (1) embosser,
 - (Z) One (1) electricity fueled infrared oven,
 - (AA) One (1) cooling conveyor,
 - (BB) One (1) trim mixer,
 - (CC) One (1) pneumatically loaded silo, containing limestone, storage capacity of 248 tons, and
 - (DD) One (1) 4.50 million British thermal units per hour (mmBtu/hr) natural gas fired Lines 6 & 7 oil heater, installed prior to 1983, identified as FCU-11.
- (7) Line 8, identified as L8, constructed in 1989, with a maximum capacity of 14,000 pounds of products per hour, using thirteen (13) baghouses as control, exhausting to thirteen (13) stacks (BH-13, BH-14, BH-15, BH-16, BH-17, BH-18, BH-19, BH-20, BH-21, BH-22, BH-23, BH-24 and BH-25), consisting of the following equipment:
- (A) Two (2) bag dump stations:
 - (1) One (1) bag dump station (Bag Fill), capacity 4,000 pounds per hour,
 - (2) One (1) bag dump station (Calcium Oxide), capacity 108 pounds per hour,
 - (B) One (1) vacuum receiver, capacity 108 pounds per hour,
 - (C) Ten (10) storage silos with combined capacity of 53,914 pounds per hour,
 - (D) Two (2) weigh bins,
 - (E) Two (2) holding bins,
 - (F) Five (5) mixers,
 - (G) Two (2) calendars,
 - (H) One (1) water tank,
 - (I) One (1) laminator,
 - (J) One (1) embosser,
 - (K) Two (2) reverse rollcoating surface coating operations, capacity of 36,000 square feet per hour each,
 - (L) One (1) electricity fueled infra-red oven,
 - (M) One (1) cooling conveyor,
 - (N) One (1) trim press, and

- (O) One (1) 6.00 million British thermal units per hour (mmBtu/hr) natural gas fired Line 8 oil heater, installed in 1991, identified as FCU-12.
- (8) Line 92, identified as L92, constructed in 1966, with a maximum capacity of 3,280 pounds of products per hour, using three (3) baghouses and one (1) thermal oxidizer as control, exhausting to one (1) stack (FCU-4), consisting of the following equipment:
 - (A) One (1) fiberglass receiver, maximum capacity of 1,800 pounds per hour,
 - (B) One (1) fiberglass opener,
 - (C) Four (4) virgin cotton fiber bale breakers, maximum capacity of 2,000 pounds per hour each,
 - (D) One (1) conveyor, maximum capacity of 6,000 pounds per hour,
 - (E) One (1) fiber blender opener, maximum capacity of 6,000 pounds per hour,
 - (F) One (1) rotoblender, maximum capacity of 6,000 pounds per hour,
 - (G) One (1) feed hopper,
 - (H) One (1) air lifter,
 - (I) Five (5) bale breakers,
 - (J) Two (2) blended fiber openers,
 - (K) One (1) air lay,
 - (L) One (1) conventional oven,
 - (M) One (1) automatic dampener,
 - (N) One (1) fiber glass receiver,
 - (O) One (1) fiber glass opener,
 - (P) One (1) rotoblender,
 - (Q) One (1) reclaim screen,
 - (R) Two (2) classifiers,
 - (S) One (1) pickler,
 - (T) One (1) 17.85 million British thermal units per hour natural gas fired incinerator,
 - (U) One (1) 11.20 million British thermal units per hour (mmBtu/hr) natural gas fired Line 92 boiler, installed in 1995, identified as NAVA Oven Boiler, and
 - (V) One (1) 0.5 million British thermal units per hour (mmBtu/hr) natural gas fired Line 92 Dryer, identified as NAVA Oven.

- (9) One (1) liquid organic storage tank area, identified as VOLS, with a maximum capacity of 227,200 gallons of organic liquid, consisting of the following equipment:
- (A) One (1) fixed roof dome tank, installed in 1989, identified as Line 8 (Flux), storing asphalt, with capacity of 30,000 gallons;
 - (B) One (1) fixed roof dome tank, installed in 1989, identified as Line 8 (Coating), storing asphalt, with capacity of 30,000 gallons;
 - (C) One (1) fixed roof dome tank, installed in 1989, identified as Line 8 B-25, storing asphalt, with capacity of 30,000 gallons;
 - (D) One (1) fixed roof dome tank, installed in 1989, identified as Line 8 Latex #1, storing Latex, with capacity of 3,700 gallons;
 - (E) One (1) fixed roof dome tank, installed in 1989, identified as Line 8 Latex #2, storing Latex, with capacity of 3,700 gallons;
 - (F) One (1) fixed roof dome tank, installed prior to 1970, identified as Process Oil, storing Process Oil, with capacity of 13,500 gallons;
 - (G) One (1) fixed roof dome tank, installed in 1990, identified as Antifreeze #1, storing Antifreeze, with capacity of 1,128 gallons;
 - (H) One (1) fixed roof dome tank, installed in 1990, identified as Antifreeze #2, storing Antifreeze, with capacity of 1,128 gallons;
 - (I) One (1) fixed roof dome tank, installed in 1976, identified as Line 6 & 7 (Flux), storing asphalt, with capacity of 30,455 gallons;
 - (J) One (1) fixed roof dome tank, installed in 1976, identified as Line 6 & 7 (Coating), storing asphalt, with capacity of 30,455 gallons;
 - (K) One (1) fixed roof dome tank, installed in 1976, identified as Line 6 & 7 B-25, storing asphalt, with capacity of 30,455 gallons;
 - (L) One (1) fixed roof dome tank, installed in 1986, identified as Waste Oil, storing Waste Oil, with capacity of 2,970 gallons;
 - (M) One (1) fixed roof dome tank, installed in 1990, identified as HT Oil, storing Heat Transfer Oil, with capacity of 1,128 gallons;
 - (N) One (1) fixed roof dome tank, installed in 1990, identified as Lube Oil, storing Lube Oil, with capacity of 1,128 gallons;
 - (O) One (1) fixed roof dome tank, installed in 1976, identified as Line 6 & 7 Latex, storing Latex, with capacity of 3,700 gallons;
 - (P) One (1) 3.0 million British thermal units per hour (mmBtu/hr) natural gas fired asphalt tank heater, identified as FCU-6;
 - (Q) One (1) 4.8 million British thermal units per hour (mmBtu/hr) natural gas fired asphalt tank heater, identified as FCU-7; and

- (R) One (1) 3.0 million British thermal units per hour (mmBtu/hr) natural gas fired asphalt tank heater, identified as FCU-8.
- (10) One (1) 200 horsepower fire pump, fueled by #1 diesel fuel and one (1) 285 gallon fuel tank.
- (11) Line 91, identified as L91, constructed in 1978, with a maximum capacity of 3,823 pounds of products per hour, using three (3) baghouses and one (1) thermal oxidizer as control, exhausting to one (1) stack (FCU-2), consisting of the following equipment:
 - (A) One (1) existing rebuilt conventional oven rated at 9 million British thermal units per hour (mmBtu/hr) connected through new modified duct work to a new thermal oxidizer rated at 15 million British thermal units per hour (mmBtu/hr), using a low NOx burner as control, exhausting to one (1) stack (FCU-2(new)).
 - (B) One (1) bale breaker;
 - (C) One (1) blending box; and
 - (D) One (1) feed hopper.

Unpermitted Emission Units and Pollution Control Equipment Requiring ENSR

There are no unpermitted facilities operating at this source during this review.

New Emission Units and Pollution Control Equipment Requiring Enhanced New Source Review (ENSR)

There are no new facilities to be reviewed under the ENSR process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (1) One (1) 8.38 million British thermal units per hour (mmBtu/hr) natural gas fired boiler, installed prior to 1983, identified as FCU-5;
- (2) Fifty-two (52) natural gas fired space heaters and four (4) air makeup units with a combined maximum heat input capacity of 54.75 million British thermal units per hour (mmBtu/hr), each with individual heat capacities less than ten (10) million British thermal units. This equipment is considered to be part of the Direct Heating and Fuel Combustion Units.
- (3) VOC and HAP storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than or equal to 12,000 gallons;
- (4) VOC and HAP vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids;
- (5) Application of oils, greases, lubricants, or other nonvolatile materials applied as temporary protective coatings.
- (6) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment;
- (7) Closed loop heating and cooling systems;

- (8) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs;
- (9) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment;
- (10) Paved and unpaved roads and parking lots with public access;
- (11) Blowdown for any of the following: sight glass, boiler, compressors, pumps, and cooling tower; and
- (12) A laboratory as defined in 326 IAC 2-7-1(20)(C).

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (1) Exemption (no number), issued April 3, 1981.
- (2) Operation Permit (OP 45-12-85-0373), issued February 15, 1982.
- (3) Registration (no number), issued July 24, 1985.
- (4) Exemption (CP 089-4282), issued on January 1, 1995.
- (5) Exemption (CP 089-4301), issued on February 17, 1995.
- (6) Registration (CP 089-4461), issued on May 23, 1995, amended (A089-4642) on August 28, 1995.
- (7) Exemption (CP 089-4718), issued on August 23, 1995.
- (8) Registration (CP 089-4774), issued on November 6, 1995.
- (9) Registration (CP 089-4720), issued on February 2, 1996.
- (10) Construction Permit (CP 089-5604), issued on July 30, 1996, amended (A089-7997) on February 10, 1997.
- (11) Construction Permit (CP 089-6837), issued on December 23, 1996.
- (12) Registration (CP 089-8167), issued on May 5, 1997.
- (13) Exemption (CP 089-8353), issued on July 8, 1997.
- (14) Exemption (CP 089-9217), issued on May 22, 1998.

Air Pollution Control Justification as Integral Part of the Process

The company has submitted the following justification such that the thirteen (13) baghouses be considered as an integral part of the raw material handling in Line 8:

- (1) The baghouses have a ninety-nine and nine-tenths percent (99.9%) pollution control efficiency. Raw materials are conveyed from the bag dump stations and truck fill stations to silos. Calcium oxide is transported to the vacuum receiver. From silos and vacuum receiver materials are mixed with liquids and reacted to solid materials. The baghouses collect the unused material and vent it back to the silos for reuse. This process is pneumatically conveyed and 95% of the material is reused.

The company has submitted the following justification such that the one (1) baghouse in Line 91 and the one (1) baghouse in Line 92 be considered as an integral part of the resin recycle:

- (1) The baghouses have a ninety-nine and nine-tenths percent (99.9%) pollution control efficiency. Air stream off air lay is filtered for particulates of fiber and resin. Captured fibers are recycled into the bale breakers and the resin is recycled to the resin distributor for reuse. This process is pneumatically conveyed and 95% of the material is reused.

IDEM, OAM has evaluated the justifications and agreed that the thirteen (13) baghouses in Line 8, the one (1) baghouse in Line 91 and one (1) baghouse in Line 92 will be considered as an integral part of the raw material handling in Line 8 and the resin recycle in Line 91 and Line 92. Therefore, the permitting level will be determined using the potential emissions after the thirteen (13) baghouses in Line 8, one (1) baghouse in Line 91 and one (1) baghouse in Line 92. The source's potential particulate matter (PM) emissions after the thirteen (13) baghouses in Line 8, one (1) baghouse in Line 91 and one (1) baghouse in Line 92 are greater than one hundred (100) tons per year. Therefore, this source is still a Title V source for particulate matter (PM). Operating conditions will be specified in the proposed permit that these baghouses shall operate at all times when the raw material handling in Line 8 and the resin recycle in Line 91 and Line 92 is in operation.

Enforcement Issue

There are no Enforcement Actions pending.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 permit application for the purposes of this review was received on September 20, 1996. Additional information was received on November 25, 1996, October 31, 1996, August 8, 1997, and September 18, 1997.

A Notice of Administrative Completeness was sent to the source on October 29, 1996.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (four (4) pages).

Potential Emissions

Pursuant to 326 IAC 1-2-55, Potential Emissions are defined as “emissions of any one (1) pollutant which would be emitted from a facility, if that facility were operated without the use of pollution control equipment unless such control equipment is necessary for the facility to produce its normal product or is integral to the normal operation of the facility.”

Pollutant	Potential Emissions (tons/year)
PM	greater than 100, less than 250
PM-10	greater than 100, less than 250
SO ₂	less than 100
VOC	greater than 100, less than 250
CO	less than 100
NO _x	less than 100

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential Emissions (tons/year)
Phenol	greater than 10
Formaldehyde	greater than 10
Vinyl Acetate	greater than 10
TOTAL	greater than 25

- (a) The potential emissions (as defined in the Indiana Rule) of particulate matter (PM), PM-10 are equal to or greater than 100 tons per year Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential emissions (as defined in the Indiana Rule) of volatile organic compound (VOC) are equal to or greater than 25 tons per year Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (c) The potential emissions (as defined in Indiana Rule) of any single HAP are equal to or greater than ten (10) tons per year and the potential emissions (as defined in Indiana Rule) of a combination HAPs are greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (d) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the OAM and source's 1995 emission data.

Pollutant	Actual Emissions (tons/year)
PM	18.9
PM-10	11.3
SO ₂	0.1
VOC	22.0
CO	2.9
HAP (Phenol)	23.4
HAP (Formaldehyde)	2.0
HAP (Vinyl Acetate)	1.4
NO _x	14.6

County Attainment Status

The source is located in Lake County.

Pollutant	Status
TSP	attainment
PM-10	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	severe
CO	unclassifiable
Lead	attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Lake County has been designated as nonattainment for ozone.

Federal Rule Applicability

- (a) The 11.2 million British thermal units per hour natural gas fired boiler in Line 92 is subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.7 and 40 CFR 60.48c (a)(1) - (a)(3), Subpart Dc) because the heat input capacity is greater than ten (10) million British thermal units per hour, but less than one hundred (100) million British thermal units per hour and it was constructed in 1995 which is after the June 9, 1989 applicability date. The permittee shall submit notification of the date of construction, anticipated startup, and actual startup, as provided by § 60.7 of this part. This notification shall include:
- (1) The design heat input capacity of the affected facility and identification of fuels to be combusted in the affected facility.
 - (2) If applicable, a copy of any Federally enforceable requirement that limits the annual capacity factor for any fuel or mixture of fuels under § 60.42c, or § 60.43c.
 - (3) The annual capacity factor at which the owner or operator anticipates operating the affected facility based on all fuels fired and based on each individual fuel fired.

- (b) The fixed roof dome tank, located in the liquid organic storage tank area, identified as Process Oil, installed in 1970, with capacity of 13,500 gallons is not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.110, Subpart K), even though the capacity is within the range of the capacity subject to this rule, because it was installed prior to the June 11, 1973 applicability date.
- (c) The four (4) fixed roof dome tanks, located in the liquid organic storage tank area, identified as Line 6 & 7 (Flux), Line 6 & 7 (Coating), Line 6 & 7 B-25, each installed in 1976, each with capacity of 30,455 gallons and Line 6 & 7 latex, installed in 1976, with capacity of 3,700 gallons are not subject to the requirements of the New Source Performance Standard, 326 IAC, (40 CFR 60.110, Subpart K), even though they were constructed within the applicability date of the rule because each of their capacities are less than forty thousand (40,000) gallons.
- (d) The seven (7) fixed roof dome tanks located in the liquid organic storage tank area, identified as Latex #1 and Latex #2, each installed in 1989, each with capacity of 3,700 gallons; Antifreeze #1, Antifreeze #2, HT Oil and Lube Oil, each installed in 1990, each with capacity of 1,128 gallons; and Waste Oil, installed in 1986, with capacity 2,970 gallons; and , each installed in 1990, each with capacity of 1,128 gallons and the VOC and HAP storage tanks listed in (Insignificant Activities), are not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.110b, Subpart Kb), even though they were constructed within the applicability date of the rule because each of their capacities are less than forty (40) cubic meters.
- (e) The three (3) fixed roof dome tanks, located in the liquid organic storage tank area, identified as Line 8 (Flux), Line 8 (Coating), and Line 8 B-25, each installed in 1989, each with capacity of 30,000 are subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 116b, paragraphs (a) and (b), Subpart Kb) because the capacity is less than one hundred fifty-one (151) cubic meters but greater than seventy-five (75) cubic meters with a maximum true vapor pressure less than 15.0 kPa.
 - (1) The Permittee shall keep records readily accessible of the dimension of each storage vessel and an analysis showing the capacity of each storage vessel for this life of the source.
- (f) The 8.38 mmBtu/hr natural gas fired boiler, installed prior to 1983, identified as FCU-15, the 4.50 mmBtu/hr natural gas fired Line 2 oil heater, installed prior to 1983, identified as FCU-10, and the 4.50 mmBtu/hr natural gas fired Line 6 & 7 oil heater, installed prior to 1983, identified as FCU-11, are not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.40a, Subpart Da), even though they were constructed within the applicability date of the rule because each of their heat input capacities are less than two hundred fifty (250) million British thermal units per hour.
- (g) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR 63, applicable to this source.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration) this source is a major source because it is a major source under 326 IAC 2-3 (Emission Offset).

326 IAC 2-3 (Emission Offset)

Pursuant to 326 IAC 2-3 (Emission Offset), this source is a major source because the potential volatile organic compound (VOC) emissions are greater than twenty-five (25) tons per year.

326 IAC 1-6-3 (Preventive Maintenance Plan)

The source has submitted a Preventive Maintenance Plan (PMP) for Line 6 & 7 and Line 8 on September 20, 1996. This PMP has been verified to fulfill the requirements of 326 IAC 1-6-3 (Preventive Maintenance Plan).

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than ten (10) tons per year. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

- (a) Visible emissions shall not exceed an average of forty percent (40%) opacity in twenty-four (24) consecutive readings, as determined in 326 IAC 5-1-4.
- (b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 2-3 (Emission Offset)

Pursuant to Construction Permit (CP 089-5604-00013) issued on July 30, 1996, the use of #1 diesel fuel shall be limited to 1,199 gallons per month. This limitation is equivalent to NOx and VOC emissions of 12.0 and 1.0 ton per year, respectively, from the fire pump. This will make the requirements of 326 IAC 2-3 (Emission Offset) not applicable.

326 IAC 8-9-6 (Volatile Organic Liquid Storage Vessels, Record Keeping and Reporting Requirements)

Pursuant to 326 IAC 8-9-6 (Volatile Organic Liquid Storage Vessels, Record Keeping and Reporting Requirements), the Permittee shall maintain the following records for the fifteen (15) fixed roof dome tanks and the VOC and HAP storage tanks listed in (Insignificant Activities), located in the liquid organic storage tank area for the life of the source:

- (1) The vessel identification number.
- (2) The vessel dimensions.
- (3) The vessel capacity.

326 IAC 8-7 (Specific Reduction Requirements for Lake, Porter, Clark, and Floyd Counties)

Pursuant to 326 IAC 8-7 (Specific Reduction Requirements for Lake, Porter, Clark, and Floyd Counties), this source must implement one (1) of the following emissions reduction measures:

- (1) An overall VOC reduction from baseline actual emissions of at least ninety-eight percent (98%) by the documented reduction in use of VOC containing materials or install an add-on control system that achieves an overall control efficiency of ninety-eight (98%).

- (2) Where it can be demonstrated by the source that control technology does not exist that is reasonably available and both technologically and economically feasible to achieve a ninety-eight (98%) reduction in VOC emissions, a source shall achieve an overall VOC reduction of at least eighty-one percent (81%) from baseline actual emission with the documented reduction in use of VOC containing materials or install and add-on control system that achieves an overall control efficiency of eighty-one percent (81%).
- (3) Achieve an alternate overall emission reduction with the application of a reasonably available control technology (RACT) that has been determined as reasonable available by the U.S. EPA and the department. A petition developed in accordance with the procedures in 326 IAC 8-1-5 shall accompany the request for an alternative overall emission reduction.

Pursuant to Exemption (CP 089-9217-00013), issued on May 22, 1998, the Line 91 conventional oven shall use the one (1) 15 million British thermal units per hour (mmBtu/hr) thermal oxidizer with low NOx burner to satisfy the requirements of 326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark and Floyd Counties: Emission Limits).

The source has submitted the following analysis:

For the purposes of this study cost effectiveness evaluations were based on \$2,000 (1976) per ton of pollutant removed. Using the Chemical Engineering Plant Cost Index and Engineering Guide #46 and the 1976 Dollars were adjusted to current Dollars (Current Value: \$3,991 in 1995).

The source's potential volatile organic compound (VOC) emissions are 141.12 tons per year. The source's actual volatile organic compound (VOC) emissions for 1995 were 22.0 tons per year.

The following affected facilities shall be evaluated to determine reasonable available control technologies in accordance with the rule:

- (A) Hot Molding Department: Nine (9) hot molding presses known as: OTT-7, OTT-4, HAM-12, ERIE-8, HAM-11, HAM-15, OTT-1, HAM-10, and W&W-6;
- (B) CJ Line: Curing Oven;
- (C) Dept. 44: Curing Oven;
- (D) FB Line: Curing Oven; and
- (E) #91 Padding Line; #92 Padding Line: Curing Oven and NAVA Oven.

Hot Molding Department

The hot molding department produces various sound absorbers from cotton pads for the automotive industry. In the molding process semi-cured phenolic resin impregnated cotton batts will be heated to finish the curing process and form the material into sound absorbers. The molding presses utilized use heat conduction to penetrate the batts. The molds are custom made to produce a specific part and can be exchanged. For the purpose of this RACT study emission estimates are based on the largest mold which can be fitted into a particular press, thus calculating maximum emissions. The padding material is made of 60 to 80% reclaimed cotton and synthetic fibers and 35% phenol formaldehyde polymer. The semi-cured batts are manually laid into the mold, the press closed for approximately three (3) minutes while heat is applied to the material. The heat is used to complete polymerization of the resin. The press is opened after a preset time and the molded material is manually removed. The pad may be placed in a cooling buck to enhance setup time and is trimmed by pressure in a trimming press. A release agent, Diamondkote W-3119, is sprayed mold to prevent sticking of the pad to the metal surfaces. The material is water based and contains no VOC per the MSDS sheet.

The ventilation of the department is divided into three distinct zones, named after their locations: South, Middle and North zone. OTT-7, OTT-4 and HAM-12 are located in the South zone, W&W-6, ERIE-8, HAM-10 and HAM-11 in the middle and HAM-15 and OTT-1 in the North Zone. The following section describes each press and its emissions. The control technology review and cost effectiveness analysis has been performed for the treatment of emissions from each of the zones separately.

CJ Line

The CJ Line is currently used to produce fully cured pad with barrier and damper/foam/barrier parts. Rieter Automotive North American, Inc. proposes to separate the production of the two materials and add a second line designated to the production of Damper/Foam/Barrier in the second half of 1995. Stack tests have been performed on the CJ Line while running both products. Emission calculations based on maximum production rates determined that the production of fully cured pad with barrier creates the highest VOC emissions. This RACT analysis is therefore based on 8760 hours/year production of fully cured pads with barrier. The pads are cured in an oven at approximately 500 °F. While the material is still hot it is formed in cold presses and trimmed. The material trimmed from the parts is taken to a reprocess mixer or hauled off-site to a landfill.

Department 44

Department 44 produces fully cured pad with barrier. The product is cured in an oven at approximately 500 °F. While the material is still hot it is formed in cold presses and trimmed. The material trimmed from the parts is taken to a reprocess mixer or hauled off-site to a landfill.

Padding Line 92

Padding Line 92 is currently used to manufacture both semi-cured and fully cured batts. The oven temperature used to produce semi-cured batts is 325 °F (550 °F for fully cured material). 35% of the total weight of the padding material entering the oven is phenolic resin, the rest cotton fibers. As a result of the lower oven temperature, the manufacturing of semi-cured batts. The emissions have the same constituents, however, VOC's, phenol, ammonia, formaldehyde, and particulate matter.

Rieter Automotive North America, Inc. installed a NAVA oven in 1995 in place of a Proctor & Schwartz oven for the production of semi-cured pad. The NAVA oven cures the pad with steam, this using less air than the conventional Proctor & Schwartz oven. Stack tests performed on NAVA ovens show lower emissions than conventional ovens. Rieter Automotive North America, Inc. has evaluated the technical feasibility and cost-effectiveness for both the Proctor & Schwartz oven and the NAVA oven.

FP Line

The FP Line is used to produce a part consisting of foam sandwiched between damper and a barrier material. The foam and damper layers are cured in an oven at approximately 300°F. While the materials are still hot the barrier is added at the laminator, where the part is heat formed, then cooled and trimmed. The material trimmed from the parts is taken to a reprocess mixer or hauled off-site to a landfill.

Potential Emissions

Emission calculations for the Hot Mold Department were based on a stack tests performed. The pollutant concentration during the test was below 50 ppm, therefore in accordance with IDEM regulations USEPA Method 25A results were used to calculate the emission factor:

$$E_f = E_r [\text{lbs/hr}] / P_r [\text{lbs/hr}] = 1.26 [\text{lbs/hr}] / 473 [\text{lbs/hr}] = 2.664 \text{ E}^{-03} \text{ for the Hot Mold Dept.}$$

Where:

Ef = Emission factor
Er = Emission rate
Pr = Production rate

South Zone (Hot Mold Department)

Press Identification	Max. Annual Throughput	Captured VOC Emissions
OTT-7	1,626,040 lbs/yr	2.165 tons/yr
OTT-4	1,626,040 lbs/yr	2.165 tons/yr
HAM-12	1,626,040 lbs/yr	2.165 tons/yr
TOTAL:		6.496 tons/yr

Middle Zone (Hot Mold Department)

Press Identification	Max. Annual Throughput	Captured VOC Emissions
W&W-6	1,782,000 lbs/yr	2.373 tons/yr
ERIE-8	1,782,000 lbs/yr	2.373 tons/yr
HAM-11	1,782,000 lbs/yr	2.373 tons/yr
HAM-10	1,782,000 lbs/yr	2.373 tons/yr
TOTAL:		9.493 tons/yr

North Zone (Hot Mold Department)

Press Identification	Max. Annual Throughput	Captured VOC Emissions
HAM-15	2,148,000 lbs/yr	2.861 tons/yr
OTT-1	1,782,000 lbs/yr	2.373 tons/yr
TOTAL:		5.234 tons/yr

The emission factors used in the calculations for the CJ Line were developed based on stack tests performed on the three stacks associated with the CJ Oven. The results of these test can also be applied to Department 44 Post Curing Oven. Emission calculations are based on the production of fully cured pad with barrier 8760 hours/year. The existing exhaust system captures 100% of emissions resulting from this process.

$E_f = 0.198 \text{ lbs VOC/ton production for the CJ Line and Department 44}$

CJ Line

CJ Line	Max. Annual Throughput	Captured VOC Emissions
Post Curing Oven	24,449,160 lbs/year	1.21 tons/year

Department 44

Department 44	Max. Annual Throughput	Captured VOC Emissions
Curing Oven	45,954,960 lbs/year	2.27 tons/year

Line 92 emission factor was used for the calculations because the NAVA oven is capable of producing semi cured pads.

Emission Factor $E_f = 4.73 \times 10^{-3} \text{ lbs VOC/lb production for the NAVA oven}$

Line 92 NAVA Curing Oven

Padding Line 92	Max. Annual Throughput	Captured VOC Emissions
NAVA Curing Oven	28,1732,000 lbs/year	6.80 tons/year

The emission factors used in the calculations of the FP Line were developed based on stack tests performed on the three stacks associated with the CJ Oven in the CJ Line while the line was producing Damper/Foam/Barrier. Emission calculations are based on 8760 hours/year production.

Emission Factor $EF = 0.458 \text{ lbs VOC/ton production for the FP Line}$

FP Line

FP Line	Max. Annual Throughput	Captured VOC Emissions
Curing Oven	5,860,440 lbs/year	0.67 tons/year

The stack test performed on the Hot Molding Department measured only emissions captured by the ventilation system. The capture efficiency of the ventilation system during the stack test was estimated at 90% of tested emissions. Total VOC emissions are:

$$VOC_{total} = VOC_{captured} / 0.90$$

South Zone (Hot Mold Department)

Press Identification	Captured VOC Emissions	Total Potential VOC Emissions
OTT-4	2.165 tons/yr	2.406 tons/yr
OTT-4	2.165 tons/yr	2.406 tons/yr
HAM-12	2.165 tons/yr	2.406 tons/yr
TOTAL:	6.496 tons/year	7.219 tons/yr

Middle Zone (Hot Mold Department)

Press Identification	Captured VOC Emissions	Total Potential VOC Emissions
W&W-6	2.373 tons/yr	2.637 tons/yr
ERIE-8	2.373 tons/yr	2.637 tons/yr
HAM-11	2.373 tons/yr	2.637 tons/yr
HAM-10	2.373 tons/yr	2.637 tons/yr
TOTAL:	9.493 tons/year	10.549 tons/yr

North Zone (Hot Mold Department)

Press Identification	Captured VOC Emissions	Total Potential VOC Emissions
HAM-15	2.861 tons/yr	3.179 tons/yr
OTT-1	2.373 tons/yr	2.637 tons/yr
TOTAL:	9.493 tons/year	10.549 tons/yr

Technical Feasibility of Add-on Control Systems for 98% VOC Reduction

Carbon Adsorber

Adsorption is defined as the tendency of a solid substance to condense and retain on its surface a layer of gaseous or liquid substance. By this process, gases, liquids, or solids, even at very small concentrations, can be selectively captured or removed from airstreams with specific materials known as adsorbents. The material adsorbed is called the adsorbate.

Activated carbon is the adsorbent most suitable for removing organic vapors. Carbon adsorbs substantial amounts of all organic vapors from the air at ambient temperature regardless of variations in concentration and humidity conditions.

Unsaturated compounds are generally more completely adsorbed than saturated compounds, and cyclical compounds are more easily adsorbed than linearly structured materials. Also, the adsorption capacity is enhanced by lower operating temperatures and higher concentrations. VOCs characterized by low vapor pressures are more easily adsorbed than those with high vapor pressures. Hydrocarbons with higher molecular weight are captured and retained better than low molecular weight hydrocarbons. VOCs which are not suitable for carbon adsorption are reactive compounds (organic acids, aldehydes, ketones, and monomers) and high boilers (phenols, glycols, resins and long chain hydrocarbons - C14 and up). In general, removal of gaseous vapors by physical adsorption and the reactivation of the carbon is practical for gases with molecular weights over 45 and for water insoluble or mostly insoluble hydrocarbons. The following Table lists the VOC components emitted from these facilities and their molecular weight.

Organic Compound	Molecular Weight
Phenol	94.1
Formaldehyde	30.0

Phenol and Formaldehyde, make up 32% of total VOC emissions. Partially polymerized resin makes up the rest. It is believed that the carbon adsorber bed would be fouled by the polymerization of the resins in the exhaust stream and or clogged by fine particulates. It is technically not feasible to remove VOC with this technology.

Catalytic Oxidation

In a typical catalytic oxidation system a blower introduces the emission laden process stream. A recuperative heat exchanger and burner preheat the stream to the catalytic oxidation temperature (700°F). The metal catalyst aids in the oxidation of organic compounds to CO₂ and water vapor. The heated effluent stream exits the catalyst, enters the heat exchanger, and preheats the influent stream before final discharge to the atmosphere.

The catalyst material in such a device would react with the resin which will be emitted. There is a possibility of contamination of the catalyst. Also, there will be fine particulate matter present in the exhaust stream which could foul the catalyst. Thus, the option is not technically feasible.

Thermal Oxidation

Thermal oxidation, recuperative and regenerative, is a widely used air pollution control technique whereby organic vapors are oxidized at high temperatures. Combustion systems are often relatively simple devices capable of achieving very high removal efficiencies. They consist of burners, which ignites the fuel and organic compounds, and a chamber, which provides appropriate residence time for the oxidation process. The stream is held at the oxidation temperature (1400 - 1800 °F) for typically 0.5 to 1.0 seconds, where the organic materials are oxidized. The effluent stream enters the heat exchanger and preheats the influent air stream before final discharge to atmosphere. To achieve complete combustion once the air, waste, and fuel have been brought into contact, the following conditions must be provided: a temperature high enough to ignite the waste/fuel mixture, turbulent mixing of the air and waste fuel; and sufficient residence time for the reaction to occur.

The incineration of emissions streams, containing organic vapors with halogen or sulfur components may create additional control requirements. For example, if sulfur and/or chlorine are present in the emission streams, the resulting flue gas will contain sulfur dioxide and/or hydrogen chloride. This is not the case with the emissions from this source. There are potential problems with use of such a device for this source. For example, resin deposits on the heat exchangers could result in heat exchanger fouling and a fire hazard. However, we feel that due to the higher operating temperatures of a recuperative thermal oxidizer compared to catalytic oxidizer all polymers will be combusted. This option is considered to be technically feasible, and was considered in the cost-effectiveness analysis.

Condenser

Condensation is the process of converting a gas or vapor to liquid. Any gas can be reduced to a liquid by sufficiently lowering its temperature and/or increasing its pressure. The most common approach is to reduce the temperature of the gas stream, since increasing the pressure of a gas can be expensive.

Condensers are simple, relatively inexpensive devices that normally use water or air to cool and condense a vapor stream. Since these devices are usually not required or capable of reaching low temperatures (below 100 deg. F), high removal efficiencies of most gaseous pollutants are not obtained unless the vapors will condense at high temperatures. When a hot vapor stream contacts a cooler medium, heat is transferred from the hot gases to the cooler medium. As the temperature of the vapor stream is cooled, the average kinetic energy of the gas is reduced. Ultimately the gas molecules are slowed down and crowded so closely together that the attractive forces between the molecules cause them to condense to a liquid. Condensation occurs when the partial pressure of the pollutant in the gas stream equals its vapor pressure as a pure substance at the operating temperature.

Condensers are typically used as pretreatment devices. They are used ahead of adsorbers, absorbers, and incinerators, to reduce the total gas volume to be treated by more expensive control equipment. Due to the fact that the process doesn't utilize any solvents, a condenser is not considered to be a technically feasible control option to reduce emissions from this source.

Scrubber

Gas absorption as applied to the control of air pollution is concerned with the removal of one or more pollutants from a contaminated gas stream by treatment with a liquid. The process of absorption conventionally refers to the intimate contacting of a mixture of gases with a liquid so that part of one or more of the constituents of the gas will dissolve in the liquid. Because of the need for an effective gas/liquid contacting mechanism, there are a variety of basic wet scrubbers.

The necessary condition is the solubility of these pollutants in the absorbing liquid. The rate of transfer of the soluble constituents from the gas to the liquid phase is determined by diffusional processes occurring on each side of the gas-liquid interface. Equilibrium is another important factor to be considered in controlling the operation of absorption systems. The rate at which the pollutant will diffuse into an absorbent liquid will depend on the departure from equilibrium which is maintained. The rate at which the pollutant mass is transferred from one phase to another depends also on a so-called mass transfer, or rate coefficient, which equates the quantity of mass being transferred with the driving force.

The batch type operation of this source will lead to fluctuating pollutant concentrations in the exhaust gas stream. Because the driving forces on which absorption technology is based is the difference between equilibrium concentrations and actual concentrations, extremely poor control efficiency have to be expected due to the varying pollutant concentrations in the exhaust. Scrubber technology is therefore considered to be technically not feasible.

Capture and Control Efficiency

98% destruction efficiency can be achieved through a Recuperative Thermal Oxidizer (RTO) when it is operated at 1800°F, and with a residence time of 0.75 seconds. RTO's are normally sized for operation at 1400°F with a retention time of 0.5 seconds will provide 95% destruction efficiency.

An overall control efficiency of 98% as required by RACT can therefore only be reached with 100% capture efficiency of emissions. 100% capture can be achieved if each press is equipped with a permanent enclosure. A review of the feasibility of totally enclosing all molding presses brought the following results:

- # Each press has to be equipped with a mechanical material handling system to load/unload the cotton batts.
- # The installation of enclosures and material handling equipment results in an increase of floor space needed.

The increased space and equipment requirements are included in the cost effectiveness analysis.

Cost-Effectiveness Analysis

The cost effective analysis was based on the USEPA OAQPS Control Cost Manual

South Zone (Hot Mold Department)

Technically Feasible Control Alternative	Capital Cost (\$)	Annualized Cost (\$)	\$/Ton Removed
Recuperative Thermal Oxidizer	1,544,133	536,168	75,788

Middle Zone (Hot Mold Department)

Technically Feasible Control Alternative	Capital Cost (\$)	Annualized Cost (\$)	\$/Ton Removed
Recuperative Thermal Oxidizer	2,016,381	697,128	67,433

North Zone (Hot Mold Department)

Technically Feasible Control Alternative	Capital Cost (\$)	Annualized Cost (\$)	\$/Ton Removed
Recuperative Thermal Oxidizer	1,062,600	373,297	65,494

CJ Line

Technically Feasible Control Alternative	Capital Cost (\$)	Annualized Cost (\$)	\$/Ton Removed
Recuperative Thermal Oxidizer	289,800	221,710	186,971

Department 44

Technically Feasible Control Alternative	Capital Cost (\$)	Annualized Cost (\$)	\$/Ton Removed
Recuperative Thermal Oxidizer	247,891	186,091	83,652

Line 92 NAVA Curing Oven

Technically Feasible Control Alternative	Capital Cost (\$)	Annualized Cost (\$)	\$/Ton Removed
Recuperative Thermal Oxidizer	254,645	174,594	26,211

FP Line

Technically Feasible Control Alternative	Capital Cost (\$)	Annualized Cost (\$)	\$/Ton Removed
Recuperative Thermal Oxidizer	21,911	36,837	56,103

Discussion of Control Options

A BACT/LAER Clearinghouse search was performed for SIC codes 3296, 2291, 2293 and 3079. Similar industries were not listed in the five (5) year or historical directory. We propose that 98% control of emissions is economically not feasible.

Alternative Materials

An alternative resin which would create lower VOC emissions is currently not available. Rieter Automotive North America, Inc. is searching for alternative solutions.

Proposed Alternative Control Program for the Line 92 NAVA Curing Oven

All Proctor & Schwartz oven exhausts as well as the Cross Over Duct from the former Line 91 are currently connected to a Thermal Research & Engineering Model LV18 thermal oxidizer (Line 92 TO) installed in 1985. Line 92 TO operates with a measured exit gas temperature at 350°F. It has been determined to control the NAVA oven with the currently installed control equipment and that the design of the facility should be considered RACT.

The change in work practice from the conventional Proctor & Schwartz oven to the NAVA oven reduces uncontrolled maximum potential baseline emissions by 80.68%.

Proctor & Schwartz Potential Emissions [TPY]	NAVA Oven Potential Emissions [TPY]
35.184	6.797

Based on the NAVA oven design it is estimated that the existing Line 92 incinerator will capture 96% of NAVA oven emissions. Line 92 incinerator destruction efficiency based on the stack test performed by FBT is 85.47%. This results in an overall control efficiency of Line 92 emission of 82.05%.

Max. Uncontrolled Emissions [TPY]	Max. Controlled Emissions [TPY]
6.797	0.278

Actual Emission for baseline year 1993 are estimated on a 3,938.91 tons per year production, an emission factor of $2.45E^{-03}$ lbs/lb of production and 50.97% overall control efficiency:

Actual Uncontrolled Emissions [TPY]	Actual Controlled Emissions [TPY]
9.65	4.73

The change in work practice in addition to the increased overall control efficiency of the NAVA oven results in an overall reduction of potential controlled emissions of 98.39%.

Max. Controlled Proctor & Schwartz Emissions [TPY]	Max. Controlled NAVA Oven Emissions [TPY]
17.25	0.278

Technical Feasibility of Add-on Control Systems for 81% VOC Reduction

The same technical review applies for 81% as 98% overall VOC reduction

Capture and Control Efficiency

95% destruction efficiency can be achieved through a Recuperative Thermal Oxidizer (RTO) when it is operated at 1400°F, and with a residence time of 0.5 seconds.

An overall control efficiency of 81% as required by RACT can therefore only be reached with 85% capture efficiency. This capture efficiency is achieved with the existing ventilation system.

Cost-Effectiveness Analysis

The cost effectiveness analysis was based on the USEPA OAQPS Control Cost Manual

South Zone (Hot Mold Department)

Technically Feasible Control Alternative	Capital Cost (\$)	Annualized Cost (\$)	\$/Ton Removed
Recuperative Thermal Oxidizer (95%)	2,511,600	1,365,744	221,272

Middle Zone (Hot Mold Department)

Technically Feasible Control Alternative	Capital Cost (\$)	Annualized Cost (\$)	\$/Ton Removed
Recuperative Thermal Oxidizer (95%)	3,071,904	1,759,900	195,124

North Zone (Hot Mold Department)

Technically Feasible Control Alternative	Capital Cost (\$)	Annualized Cost (\$)	\$/Ton Removed
Recuperative Thermal Oxidizer (95%)	470,781	348,395	70,062

CJ Line

Technically Feasible Control Alternative	Capital Cost (\$)	Annualized Cost (\$)	\$/Ton Removed
Recuperative Thermal Oxidizer (95%)	289,800	191,614	166,694

Department 44

Technically Feasible Control Alternative	Capital Cost (\$)	Annualized Cost (\$)	\$/Ton Removed
Recuperative Thermal Oxidizer (95%)	247,891	151,853	70,916

Line 92 Curing Oven

Technically Feasible Control Alternative	Capital Cost (\$)	Annualized Cost (\$)	\$/Ton Removed
Recuperative Thermal Oxidizer (95%)	660,802	310,362	10,919

FP Line

Technically Feasible Control Alternative	Capital Cost (\$)	Annualized Cost (\$)	\$/Ton Removed
Recuperative Thermal Oxidizer (95%)	21,911	36,085	56,692

Discussion of Control Options

Although the existing installation is sufficient for 85% capture, this eliminating the need for equipment modifications, the cost per ton of pollutants removed increases. The higher air flow rates of this design, require a larger thermal oxidizer which raises the cost of control. Based on the information presented in this section, it has been determined that it is economically not feasible to achieve 81% control of this source and proposes that the current design of the facility should be considered RACT.

326 IAC 8-1-6 (General Reduction Requirements)

- (a) Pursuant to 326 IAC 8-1-6 (General Reduction Requirements) and Construction Permit (CP 089-6837-00013) issued on December 23, 1996, the volatile organic compound (VOC) the volatile organic compound (VOC) input into the NAVA Oven or the conventional oven shall be limited to 18.38 pounds per hour. This limit is based on the following equation:

$$VOC_{input} = VOC_{limit} / [1 - (Capture Efficiency)(Destruction Efficiency)]$$

For the NAVA Oven and the conventional oven:

VOC_{limit} = 3.3 pounds per hour

Capture Efficiency = 96 percent

Destruction Efficiency = 85.47 percent

VOC_{input} = 18.38 pounds per hour.

The potential VOC emissions from the NAVA oven and the conventional oven are 1.6 pounds per hour. Therefore, the ovens and the incinerator are in compliance with this requirement.

- (b) The two (2) rollcoaters in Lines 6 & 7 are not subject to the requirements of 326 IAC 8-1-6 (General Reduction Requirements) because their potential VOC emissions are less than twenty-five (25) tons per year.
- (c) The two (2) reverse rollcoaters located in Line 8 are not subject to the requirements of 326 IAC 8-1-6 (General Reduction Requirements) because they are subject to another provision of 326 IAC 8, specifically 326 IAC 8-2-5 (Paper Coating Operations).
- (d) The two (2) Line 2 coating lines are not subject to the requirements of 326 IAC 8-1-6 (General Reduction Requirements) because they are subject to another provision of 326 IAC 8, specifically 326 IAC 8-2-11 (Fabric and Vinyl Coating Operations).
- (e) Hot Molding Department: OTT-7, OTT-4, HAM-12, ERIE-8, HAM-11, HAM-15, OTT-1, HAM-10, and W&W-6, CJ Line: Curing Oven, Dept. 44: Curing Oven, FB Line: Curing Oven, and #92 Padding Line: Curing Oven and NAVA Oven are not subject to the requirements of 326 IAC 8-1-6 (General Reduction Requirements) because they are subject to another provision of 326 IAC 8, specifically 326 IAC 8-7 (Specific Reduction Requirements for Lake, Porter, Clark, and Floyd Counties).
- (f) Pursuant to Exemption (CP 089-9217-00013), issued May 22, 1998, the Volatile Organic Compound (VOC) emissions from the Line 91 shall be limited to ten (10) pounds per hour and forty-three (43) tons per year.

326 IAC 8-2-5 (Paper Coating Operations)

Pursuant to 326 IAC 8-2-5 (Paper Coating Operations), the two (2) reverse rollcoaters located in Line 8 shall not discharge into the atmosphere of any volatile organic compound (VOC) in excess of 2.9 pounds per gallon, excluding water, delivered to the coating applicator.

Based on MSDS submitted by the source and calculations made (see page 4 of 4, TSD Appendix A), the two (2) reverse rollcoaters are in compliance with this requirement.

326 IAC 8-2-11 (Fabric and Vinyl Coating)

Pursuant to 326 IAC 8-2-11 (Fabric and Vinyl Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator at the two (2) Line 2 coating lines shall be limited to 2.9 pounds of VOC per gallon of coating excluding water.

Based on the MSDS submitted by the source and calculations made (see page 3 of 4, TSD Appendix A), the two (2) rollcoaters in Line 2 are in compliance with this requirement.

326 IAC 6-1-10.1 (Lake County PM₁₀ Emission Requirements)

Pursuant to 326 IAC 6-1-10.1 (Lake County PM₁₀ Emission Requirements), the one (1) asphalt saturator located in Line 2 shall be limited to 0.060 pounds PM₁₀ per ton of product and 4.5 pounds PM₁₀ per hour.

The allowable pounds PM₁₀ per hour is 4.5 and the potential is 3.3 pounds PM₁₀ per hour. Therefore, the asphalt saturator is in compliance with this requirement.

The allowable tons of product per year is established as follows:

4.5 pounds PM₁₀ per hour / 0.06 pounds PM₁₀ per ton of product = 75 tons of product per hour.

The potential tons of product per year is 0.944. Therefore, the asphalt saturator is in compliance with this requirement.

326 IAC 6-3-2 (Process Operations)

Pursuant to 326 IAC 6-3-2 (Process Operations), the particulate matter (PM) overspray from the one (1) hot molding department, the one (1) foam part line, the one (1) CJ line, Department 44, Line 2, Lines 6 & 7, Line 8, and Line 92 shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

- (a) For the one (1) hot molding department:
P = 2,794 pounds per hour = 1.397 tons per hour
E = 5.12 pounds per hour
- (b) For the one (1) foam part line:
P = 1,277 pounds per hour = 0.6385 tons per hour
E = 3.03 pounds per hour
- (c) For the one (1) CJ Line:
P = 2,800 pounds per hour = 1.4 tons per hour
E = 5.13 pounds per hour
- (d) For Department 44:
P = 5,246 pounds per hour = 2.623 tons per hour
E = 7.82 pounds per hour
- (e) For Line 2:
P = 3,744 pounds per hour = 1.872 tons per hour
E = 6.24 pounds per hour
- (f) For Lines 6 & 7:
P = 13,200 pounds per hour = 6.6 tons per hour
E = 14.51 pounds per hour
The twelve (12) baghouses for Lines 6 & 7 shall be in operation at all times when Lines 6 & 7 are in operation to ensure compliance with this requirement.
- (g) For Line 8:
P = 14,000 pounds per hour = 7 tons per hour
E = 15.10 pounds per hour
The thirteen (13) baghouses for Line 8 shall be in operation at all times when Line 8 is in operation to ensure compliance with this requirement.
- (h) For Line 92:
P = 3,280 pounds per hour = 1.64 tons per hour
E = 5.71 pounds per hour
The three (3) baghouses for Line 92 shall be in operation at all times when Line 92 is in operation to ensure compliance with this requirement.

- (i) For Line 91:
P = 3,823 pounds per hour = 1.91
E = 6.32 pounds per hour
The three (3) baghouses for Line 91 shall be in operation at all times when Line 91 is in operation to ensure compliance with this requirement.

326 IAC 6-2-2 (Emission Limitations for Facilities Specified in 326 IAC 6-2-1(a))

Pursuant to 326 IAC 6-2-2 (Emission limitations for facilities specified in 326 IAC 6-2-1(a)), the one (1) 8.38 mmBtu/hr boiler constructed prior to 1983, shall be limited to 0.60 pounds particulate matter per million British thermal unit (lb/mmBtu).

This limit is based on the following equation:

$$Pt = 0.87 / Q^{0.16}$$

Where:

Pt = Pounds of particulate matter emitted per million Btu heat input (lb/mmBtu).

Q = Total source maximum operating capacity rating in million Btu per hour (mmBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's operation permit application, except when some lower capacity is contained in the facility's operation permit; in which case the capacity specified in the operation permit shall be used.

For the one (1) boiler and two (2) oil heaters:

Q = 8.38 mmBtu/hr

Pt = 0.60 lb/mmBtu

The one (1) boiler is in compliance by the following equations:

13.7 lb/MMCF, to convert this to lb/mmBtu

$$= 7.8 \text{ lb/kgal} * \text{kgal}/1000 \text{ gal} * \text{gal}/0.15 \text{ mmBtu}$$

$$= 0.052 \text{ lb/mmBtu} < 0.60 \text{ lb/mmBtu}$$

Therefore the one (1) boiler is in compliance with this requirement.

326 IAC 6-2-4 (Emission Limitations for Facilities specified in 326 IAC 6-2-1(c))

Pursuant to 326 IAC 6-2-4 (Emission Limitations for Facilities specified in 326 IAC 6-2-1(c)), the one (1) 11.2 mmBtu/hr natural gas fired Line 92 boiler constructed in 1995 is limited to 0.50 pounds per million British thermal units per hour (lb/mmBtu).

This limitation is based on the following equation:

$$Pt = 1.09 / Q^{0.26}$$

Where:

Pt = Pounds of particulate matter emitted per million Btu heat input (lb/mmBtu).

Q = Total source maximum operating capacity rating in million Btu per hour (mmBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's operation permit application, except when some lower capacity is contained in the facility's operation permit; in which case the capacity specified in the operation permit shall be used.

For the one (1) 11.2 mmBtu/hr boiler:

Q = 8.38 + 11.2 = 19.58 mmBtu/hr.

Pt = 0.50 lb/mmBtu

The one (1) 11.2 mmBtu/hr boiler is in compliance by the following equations:

13.7 lb/MMCF, to convert this to lb/mmBtu

= 7.8 lb/kgal * kgal/1000 gal * gal/0.15 mmBtu

= 0.052 lb/mmBtu < 0.50 lb/mmBtu

Therefore the one (1) 11.2 mmBtu/hr boiler is in compliance with this requirement.

326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations) and 326 IAC 7-4-1.1 (Lake County Sulfur Dioxide Emission Limitations)

The 200 horsepower fire pump, fueled by #1 diesel fuel is not subject to the requirements of 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations) and 326 IAC 7-4-1.1 (Lake County Sulfur Dioxide Emission Limitations), because the potential sulfur dioxide emissions are less than twenty-five (25) tons per year.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in permit Section D are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in permit Section D. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

1. The hot mold department, the FP Line, the CJ Line, and Department 44 have applicable compliance monitoring conditions as specified below:

- (a) Daily visible emissions notations of the hot mold department, the FP Line, the CJ Line, and Department 44 stack exhausts shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.

These monitoring conditions for the hot mold department, the FP Line, the CJ Line, and Department 44 are necessary to ensure compliance with 326 IAC 6-3-2 (Process Operations) and 326 IAC 2-7 (Part 70).

2. Line 2 has applicable compliance monitoring conditions as specified below:
 - (a) Daily visible emissions notations of Line 2 stack exhaust shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.

These monitoring conditions for Line 2 are necessary to ensure compliance with 326 IAC 6-3-2 (Process Operations) and 326 IAC 2-7 (Part 70).

3. The bulk handling operations in Lines 6 & 7 have applicable compliance monitoring conditions as specified below:
 - (a) Daily visible emissions notations of the bulk handling operations in Lines 6 & 7 stack exhausts shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.

- (b) The Permittee shall record the total static pressure drop across the twelve (12) baghouses controlling the bulk handling operations in Lines 6 & 7 at least once daily when the bulk handling operations in Lines 6 & 7 are in operation. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop across the baghouses shall be maintained within the range of 2.0 to 6.0 inches of water or a range established during the latest stack test. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the pressure reading is outside of the above mentioned range for any one reading.

These monitoring conditions are necessary because the baghouses for the bulk handling operations in Lines 6 & 7 must operate properly to ensure compliance with 326 IAC 6-3-2 (Process Operations) and 326 IAC 2-7 (Part 70).

- 3. The granular material handling operations in Line 8 have applicable compliance monitoring conditions as specified below:

- (a) Daily visible emissions notations of the granular material handling operations in Line 8 stack exhausts shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.
- (b) The Permittee shall record the total static pressure drop across the thirteen (13) baghouses controlling the granular material handling operations in Line 8 at least once daily when the granular material handling operations in Line 8 are in operation. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop across the baghouses shall be maintained within the range of 2.0 to 6.0 inches of water or a range established during the latest stack test. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the pressure reading is outside of the above mentioned range for any one reading.

These monitoring conditions are necessary because the baghouses for the granular material handling operations in Line 8 must operate properly to ensure compliance with 326 IAC 6-3-2 (Process Operations) and 326 IAC 2-7 (Part 70).

4. Line 91 and Line 92 have applicable compliance monitoring conditions as specified below:
 - (a) Daily visible emissions notations of Line 91 and Line 92 stack exhausts shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.
 - (b) The Permittee shall record the total static pressure drop across the three (3) baghouses controlling Line 91 and the three (3) baghouses controlling Line 92 at least once daily when Line 91 and Line 92 are in operation. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop across the baghouses shall be maintained within the range of 0.5 to 10.0 inches of water for the Line 91 and Line 92 Fiber Prep/Process BH, 0.5 to 7.0 inches of water for the Line 91 and Line 92 Fiber Prep/Final BH, and 0.1 to 3.0 inches of water for the Line 91 and Line 92 Resin Recycle or a range established during the latest stack test. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the pressure reading is outside of the above mentioned range for any one reading.
 - (c) The one (1) 15 million British thermal units per hour (mmBtu/hr) natural gas fired thermal incinerator for the conventional oven on Line 91 and the one (1) 17.85 million British thermal units per hour (mmBtu/hr) natural gas fired thermal incinerator for the NAVA oven or conventional oven on Line 92 shall be in operation at all times when conventional oven on Line 91 and NAVA oven or conventional oven on Line 92 are in operation. When operating, the thermal incinerators shall maintain a minimum operating temperature of 1,400°F, or a temperature determined in the compliance tests to maintain a minimum overall 81% destruction of potential VOC emissions. The temperature of the thermal oxidizer at the point of oxidation shall be continuously monitored and recorded whenever any of the facilities are in operation.

These monitoring conditions are necessary because the baghouses and the thermal incinerators for Line 91 and Line 92 must operate properly to ensure compliance with 326 IAC 6-3-2 (Process Operations), 326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark, and Floyd Counties) and 326 IAC 2-7 (Part 70).

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 187 hazardous air pollutants set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Part 70 Application Form GSD-08.

- (a) This source will emit levels of air toxics greater than those that constitute major source applicability according to Section 112 of the Clean Air Act.

Conclusion

The operation of this automotive sound deadening products manufacturing operation shall be subject to the conditions of the attached proposed **Part 70 Permit No. T089-6629-00013.**

Natural Gas Combustion Only

10 < MM BTU/HR <100

Direct Heating and Fuel Combustion Units (Unpermitted)

Company NaRieter Automotive North America, Inc.

Address City 101 West Oakley Avenue, Lowell, Indiana 46356

Title V: T089-6629-00013

Plt ID: 089-00013

Reviewer: Cathie Moore

Date: 12/02/97

Heat Input Capacity
MMBtu/hrPotential Throughput
MMCF/yr

54.8

479.6

	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	13.7	13.7	0.6	140.0	2.8	35.0
Potential Emission in tons/yr	3.3	3.3	0.1	33.6	0.7	8.4

Methodology

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors for NOx: Uncontrolled = 140, Low NOx Burner = 81, Flue gas recirculation = 30

Emission Factors for CO: Uncontrolled = 35, Low NOx Burner = 61, Flue gas recirculation = 37

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
10 < MM BTU/HR <100**

Indirect Heating and Fuel Combustion Units (Unpermitted)

Company Name: Rieter Automotive North America, Inc.
Address City IN Zip: 101 West Oakley Avenue, Lowell, Indiana 46356
Title V: T089-6629-00013
Plt ID: 089-00013
Reviewer: Cathie Moore
Date: 12/02/97

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

12.0

105.1

Emission Factor in lb/MMCF	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
	13.7	13.7	0.6	140.0	2.8	35.0
Potential Emission in tons/yr	0.7	0.7	0.0	7.4	0.1	1.8

Methodology

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors for NOx: Uncontrolled = 140, Low NOx Burner = 81, Flue gas recirculation = 30

Emission Factors for CO: Uncontrolled = 35, Low NOx Burner = 61, Flue gas recirculation = 37

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

**Appendix A: Emissions Calculations
VOC and Particulate
From Rollcoating Operations on Line 2**

Page 3 of 4 TSD App A

Company Name: Rieter Automotive North America, Inc.
Address City IN Zip: 101 West Oakley Avenue, Lowell, Indiana 46356
Title V: T089-6629-00013
Plt ID: 089-00013
Reviewer: Cathie Moore
Date: 12/3/97

Material	Density (Lb/Gal)	Weight % Volatile (H2O& Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential ton/yr	lb VOC /gal solids	Transfer Efficiency
Line 2, Coater 1, Flexacryl 2586	8.5	37.47%	36.8%	0.7%	37.0%	63.77%	0.00468	15900.000	0.10	0.06	4.48	107.56	19.63	0.00	0.09	100%
Line 2, Coater 2, Fuller PD-0681 Flue	8.4	44.00%	43.4%	0.6%	43.7%	56.00%	0.00202	15900.000	0.09	0.05	1.68	40.22	7.34	0.00	0.09	100%

State Potential Emissions

Add worst case coating to all solvents

6.16

147.78

26.97

0.00

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used

**Appendix A: Emissions Calculations
VOC and Particulate
From Rollcoating Operations on Line 8**

Page 4 of 4 TSD App A

Company Name: Rieter Automotive North America, Inc.
Address City IN Zip: 101 West Oakley Avenue, Lowell, Indiana 46356
Title V: T089-6629-00013
Plt ID: 089-00013
Reviewer: Cathie Moore
Date: 12/5/97

Material	Density (Lb/Gal)	Weight % Volatile (H2O& Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential ton/yr	lb VOC /gal solids	Transfer Efficiency
Line 8, Coater #1, Antiblock	10.9	42.78%	42.7%	0.1%	55.9%	43.60%	0.00183	36000.000	0.02	0.01	0.65	15.55	2.84	0.00	0.02	100%
Line 8, Coater #2, Hot Melt	8.0	0.00%	0.0%	0.0%	0.0%	100.00%	0.00250	36000.000	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100%

State Potential Emissions

Add worst case coating to all solvents

0.65

15.55

2.84

0.00

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used

Indiana Department of Environmental Management Office of Air Management

Addendum to the Technical Support Document for Part 70 Operating Permit

Source Name: Rieter Automotive North America, Inc.
Source Location: 101 West Oakley, Lowell, Indiana 46356
County: Lake
SIC Code: 3717
Operation Permit No.: T089-6629-00013
Permit Reviewer: Catherine Moore

On October 5, 1998, the Office of Air Management (OAM) had a notice published in the Times, Munster, Indiana and Gary Post Tribune, Gary, Indiana, stating that Rieter Automotive North America, Inc. had applied for a Part 70 Operating Permit to operate an automotive sound deadening products manufacturing operation. The notice also stated that OAM proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On November 4, 1998, Mary Ann Saggese, attorney for Rieter Automotive North America submitted comments on the proposed Part 70 Operating Permit. The summary of the comments is as follows (~~strikeout~~ added to show what was deleted and **bold** added to show what was added):

Comment 1:

Section A.1 - The responsible official is now Jeff Windlow. We request that this name change be noted.

Response to Comment 1:

Condition A.1 "General Information" has been changed to be as follows:

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary automotive sound deadening products manufacturing operation.

Responsible Official: ~~Robert E. Gatti~~ **Jeff Windlow**
Source Address: 101 West Oakley Street, Lowell, Indiana 46356-2206
Mailing Address: 101 West Oakley Street, Lowell, Indiana 46356-2206
Phone Number: **219-696-5100**
SIC Code: 3714
County Location: Lake
County Status: Severe Nonattainment Area for Ozone
 Attainment for all other Criteria Pollutants
Source Status: Part 70 Permit Program
 Major Source under PSD Rules;
 Major Source under Emission Offset Rules;
 Major Source, Section 112 of the Clean Air Act

Comment 2:

The following are changes requested in the draft Part 70 Operating Permit to correct errors in the number of pieces of equipment listed in the respective departments, to delete equipment listed that is not an emission unit or pollution control device or to record changes pursuant to construction permits/registrations/exemptions issued since the application was filed on September 20, 1996:

Section A. Source Summary

A.2(1)(C)&(D)	Delete; not emission units.
A.2(2)(B)&(C)	Delete; not emission units.
A.2(3)(A)	One (1) 2.5 million British thermal units per hour natural gas fueled CJ oven identified as FCU-15.
A.2(3)(B)	Delete; not emission units.
A.2(4)(A)&(B)	Delete; not emission units.
A.2(4)(D)	One (1) 1.0 million British thermal units per hour (mmBtu/hr) natural gas fired Line 44 Oven, also identified as FCU-16.
A.2(5)	Line 2, identified as L2, constructed in the 1970s, with a maximum capacity of 3,744 pounds of saturated felt parts and trim scrap per hour, exhausting to one (1) stack (SV-1), consisting of the following equipment:
A.2(5)(B)	One (1) coater #1 using flexacryl with maximum capacity of 15,900 square feet of damper per hour and 63.6 gallons of flexacryl per hour,
A.2(5)(C)	One (1) coater #2 using fuller glue with maximum capacity of 15,900 square feet of damper per hour and 31.8 gallons of fuller glue per hour,
A.2(5)(B)&(C)	Changes are required because there is only one line but two (2) coaters.
A.2(5)(E)	Delete; this emission unit decommissioned; IDEM notified 8/1/97.
A.2(6)	This covers two (2) production lines #6 & #7. All the equipment on these two lines were combined by IDEM in the permits so the following changes should be made for clarification purposes.
A.2(6)(A)	Delete; not emission units.
A.2(6)(B)	Delete; not an emission unit.
A.2(6)(D)	One (1) reverse roll coater with maximum capacity of 21,750 square feet of barrier and damper sheet (filled asphaltic sheet) per hour, Line 6,
A.2(6)(E)	One (1) bag dump station with baghouse BH-12,
A.2(6)(F)	Nine (9) pneumatically loaded silos (#9 through #17) with a combined capacity of 46,945 pounds per hour,
<p>The Lines 6 & 7 silos should be grouped together since there is one particulate emission limit applied for all of the silos combined. There is no benefit to identifying each silo individually. This is the same method IDEM has already used for the Line 8 silos.</p>	
A.2(6)(G) - (L)	Delete; see above comment.
A.2(6)(M)	One (1) vacuum receiver, maximum throughput 108 pounds per hour, Line 6,

A.2(6)(N)	One (1) bag dump station, containing calcium oxide with baghouse BH-11,
A.2(6)(O) - (U)	Delete; not emission units.
A.2(6)(V)	Two (2) reverse roll coaters with maximum capacity of 13,050 square feet per hour of barrier sheet (filled asphaltic sheet) per hour, Line 7.
A.2(6)(W) - (CC)	Delete; not emission units.
A.2(6)(DD)	One (1) 4.80 million British thermal units per hour (mmBtu/hr) natural gas fired lines 6 & 7 oil heater, installed prior to 1983, identified as FCU-11,
A.2(7)(D) - (J)	Delete; not emission units.
A.2(7)(K)	Two (2) reverse roll coaters with maximum capacity of 36,000 square feet of barrier and damper sheet (filled asphaltic sheet) per hour each,
A.2(7)(L) - (N)	Delete; not emission units.
A.2(8)(H) - (J)	Delete.
A.2(8)(L)	Delete; The conventional oven was removed when the NAVA oven was installed.
A.2(8)(M) - (P)	Delete.
A.2(8)(R)	One (1) classifier,
A.2(8)(S)	One (1) picker,
<u>Insert:</u> A.2(8)(T)	One (1) resin distributor,
A.2(9)(Q)	One (1) 3.0 million British thermal units per hour (mmBtu/hr) natural gas fired asphalt tank heater, identified as FCU-7; and
A.2(10)(A)&(B)	As presented at Comment 3 and Comment 37 the emission units indicated below are insignificant activities and should be deleted from this list. Notwithstanding this comment the proper listing would be as follows:
A.2(10)(A)	One (1) 200 horsepower primary fire pump, fueled by #1 diesel fuel and one (1) 285 gallon fuel tank.
<u>Insert:</u> A.2(10)(B)	One (1) 110 horsepower emergency fire pump, fueled by #1 diesel fuel and one (1) 275 gallon fuel tank.
A.2(11)	Line 91, identified as L91, constructed in 1978, with a maximum capacity of 3,823 pounds of product per hour, using three (3) baghouses and one (1) thermal oxidizer as control, exhausting to one (1) stack (FCU-2) (new), consisting of the following equipment:
A.2(11)A	One (1) existing rebuilt conventional oven (FCU-1) rated at 9 million British thermal units per hour (mmBtu/hr) connected through new modified duct work to a new thermal oxidizer rated at 15 million British thermal units per hour (mmBtu/hr), using low NOx burner as control, exhausting to one (1) stack (FCU-2(new)).

A.2(11)(B)	Four (4) bale breakers
A.2(11)(C)	Delete
<u>Insert:</u> A.2(11)(D)	One (1) fiber opener
<u>Insert:</u> A.2(11)(E)	One (1) Airlay
<u>Insert:</u> A.2(11)(F)	One (1) Classifier
<u>Insert:</u> A.2(11)(G)	One (1) reclaim screen
<u>Insert:</u> A.2(11)(H)	One (1) picker
<u>Insert:</u> A.2(11)(I)	One (1) Resin Distributor
<u>Insert:</u> A.2(11)(J)	Two (2) aspirator tables.

The foam part cell process listed below was not identified in the draft Part 70 Operating Permit and TSD. The following needs to be added as well as the appropriate conditions and supporting information in "Section D" and the TSD.

<u>Insert:</u> A.2(12)	One (1) foam part cell, identified as Foam Cell Injection Molding, under construction in 1997/1998, with a maximum capacity of 4.273.1 pounds of trimmed parts and scrap per hour, consisting of the following equipment:
<u>Insert:</u> A.2(12)(A)	Two (2) chemical storage tanks, 8,000 gallon capacity each,
<u>Insert:</u> A.2(12)(B)	One (1) metering system
<u>Insert:</u> A.2(12)(C)	One (1) robotic injector
<u>Insert:</u> A.2(12)(D)	One (1) nitrogen blank system for the chemical storage tanks.

Section D, Facility Operation Conditions

D.1(1)(C)&(D)	Delete; not emission units.
D.1(2)(B)&(C)	Delete; not emission units.
D.1(3)(A)	One (1) 2.5 million British thermal units per hour natural gas fueled CJ oven identified as FCU-15
D.1(3)(B)	Delete; not an emission unit.
D.1(4)(A)&(B)	Delete; not emission units.
D.1(4)(D)	One (1) 1.0 million British thermal units per hour (mmBtu/hr) natural gas fired Line 44 Oven, also identified as FCU-16
D.2(5)	Line 2, identified as L2, constructed in the 1970s, with a maximum capacity of 3,744 pounds of saturated felt parts and trim scrap per hour, exhausting to one (1) stack (SV-1), consisting of the following equipment:

- D.2(5)(B) One (1) coater #1 using flexacryl with maximum capacity of 15,900 square feet of damper per hour and 63.6 gallons of flexacryl per hour,
- D.2(5)(C) One (1) coater #2 using fuller glue with maximum capacity of 15,900 square feet of damper per hour and 31.8 gallons of fuller glue per hour,
- D.2(5)(B)&(C) Changes are required because there is only one line but two (2) coaters.
- D.2(5)(E) Delete; this emission unit decommissioned; IDEM notified 8/1/97.
- D.3(6) This covers two (2) production lines #6 & #7. All the equipment on these two lines were combined by IDEM in the permits so the following changes should be made for clarification purposes.
- D.3(6)(A) Delete; not emission units.
- D.3(6)(B) Delete; not an emission unit.
- D.3(6)(D) One (1) reverse roll coater with maximum capacity of 21,750 square feet of barrier and damper sheet (filled asphaltic sheet) per hour, Line 6
- D.3(6)(E) One (1) bag dump station with baghouse BH-12
- D.3(6)(F) Nine (9) pneumatically loaded silos (#9 through #17) with a combined capacity of 46,945 pounds per hour

The Lines 6 & 7 silos should be grouped together since there is one particulate emission limit applied for all of the silos combined. There is no benefit to identifying each silo individually. This is the same method IDEM has already used for the Line 8 silos.

- D.3(6)(G) - (L) Delete; see above comment.
- D.3(6)(M) One (1) vacuum receiver, maximum throughput 108 pounds per hour, Line 6
- D.3(6)(N) One (1) bag dump station, containing calcium oxide with baghouse BH-11
- D.3(6)(O) - (U) Delete; not emission units
- D.3(6)(V) Two (2) reverse roll coaters with maximum capacity of 13,050 square feet per hour of barrier sheet (filled asphaltic sheet) per hour, Line 7.
- D.3(6)(W) - (CC) Delete; not emission units.
- D.3(6)(DD) One (1) 4.8 million British thermal units per hour (mmBtu/hr) natural gas fired lines 6 & 7 oil heater, installed prior to 1983, identified as FCU-11
- D.4(7)(D) - (J) Delete; not emission units
- D.4(7)(K) Two (2) reverse roll coaters with maximum capacity of 36,000 square feet of barrier and damper sheet (filled asphaltic sheet) per hour each
- D.4(7)(L) - (N) Delete; not emission units
- D.5(8)(H) - (J) Delete

D.5(8)(L)	Delete; The conventional oven was removed when the NAVA oven was installed.
D.5(8)(M) - (P)	Delete
D.5(8)(R)	One (1) classifier
D.5(8)(S)	One (1) picker
<u>Insert:</u> D.5(8)(T)	One (1) resin distributor
D.5(11)	Line 91, identified as L91, constructed in 1978, with a maximum capacity of 3,823 pounds of product per hour, using three (3) baghouses and one (1) thermal oxidizer as control, exhausting to one (1) stack (FCU-2)(new), consisting of the following equipment:
D.5(11)(A)	One (1) existing rebuilt conventional oven (FCU-1) rated at 9 million British thermal units per hour (mmBtu/hr) connected through new modified duct work to a new thermal oxidizer rated at 15 million British thermal units per hour (mmBtu/hr), using low NOx burner as control, exhausting to one (1) stack (FCU-2(new))
D.5(11)(B)	Four (4) bale breakers
D.5(11)(C)	Delete
<u>Insert:</u> D.5(11)(D)	One (1) fiber opener
<u>Insert:</u> D.5(11)(E)	One (1) Airlay
<u>Insert:</u> D.5(11)(F)	One (1) Classifier
<u>Insert:</u> D.5(11)(G)	One (1) reclaim screen
<u>Insert:</u> D.5(11)(H)	One (1) picker
<u>Insert:</u> D.5(11)(I)	One (1) Resin Distributor
<u>Insert:</u> D.5.(11)(J)	Two (2) aspirator tables
D.6(9)(Q)	One (1) 3.0 million British thermal units per hour (mmBtu/hr) natural gas fired asphalt tank heater, identified as FCU-7; and
D.7(11)(A)&(B)	As presented in Comment 3 and Comment 37 the emission units indicated below are insignificant activities and should be deleted from this list. Notwithstanding this comment the proper listing would be as follows:
D.7(11)(A)	One (1) 200 horsepower primary fire pump, fueled by #1 diesel fuel and one (1) 285 gallon fuel tank
<u>Insert:</u> D.7(11)(B)	One (1) 110 horsepower emergency fire pump, fueled by #1 diesel fuel and one (1) 275 gallon fuel tank

Technical Support Document (TSD) for a Part 70 Operating Permit

Permitted Emission Units and Pollution Control Equipment

- | | |
|------------|---|
| (1)(C)&(D) | Delete; not emission units |
| (2)(B)&(C) | Delete; not emission units |
| (3)(A) | One (1) 2.5 million British thermal units per hour natural gas fueled CJ oven identified as FCU-15 |
| (3)(B) | Delete; not an emission unit. |
| (4)(A)&(B) | Delete; not emission units |
| (4)(D) | One (1) 1.0 million British thermal units per hour (mmBtu/hr) natural gas fired Line 44 Oven, also identified as FCU-16 |
| (5) | Line 2, identified as L2, constructed in the 1970s, with a maximum capacity of 3,744 pounds of saturated felt parts and trim scrap per hour, exhausting to one (1) stack (SV-1), consisting of the following equipment: |
| (5)(B) | One (1) coater #1 using flexacryl with maximum capacity of 15,900 square feet of damper per hour and 63.6 gallons of flexacryl per hour |
| (5)(C) | One (1) coater #2 using fuller glue with maximum capacity of 15,900 square feet of damper per hour and 31.8 gallons of fuller glue per hour |
| (5)(B)&(C) | Changes are required because there is only one line but two (2) coaters. |
| (5)(E) | Delete; this emission unit decommissioned; IDEM notified 8/1/97 |
| (6) | This covers two (2) production lines #6 & #7. All the equipment on these two lines were combined by IDEM in the permits so the following changes should be made for clarification purposes. |
| (6)(A) | Delete; not emission units |
| (6)(B) | Delete; not an emission unit |
| (6)(D) | One (1) reverse roll coater with maximum capacity of 21,750 square feet of barrier and damper sheet (filled asphaltic sheet) per hour, Line 6 |
| (6)(E) | One (1) bag dump station with baghouse BH-12 |
| (6)(F) | Nine (9) pneumatically loaded silos (#9 through #17) with a combined capacity of 46,945 pounds per hour |

The Lines 6 & 7 silos should be grouped together since there is one particulate emission limit applied for all of the silos combined. There is no benefit to identifying each silo individually. This is the same method IDEM has already used for Line 8 silos.

- | | |
|--------------|---------------------------|
| (6)(G) - (L) | Delete; see above comment |
|--------------|---------------------------|

(6)(M)	One (1) vacuum receiver, maximum throughput 108 pounds per hour, Line 6
(6)(N)	One (1) bag dump stations, containing calcium oxide with baghouse BH-11
(6)(O) - (U)	Delete; not emission units
(6)(V)	Two (2) reverse roll coaters with maximum capacity of 13,050 square feet per hour of barrier sheet (filled asphaltic sheet) per hour, Line 7
(6)(W) - (CC)	Delete; not emission units
(6)(DD)	One (1) 4.80 million British thermal units per hour (mmBtu/hr) natural gas fired lines 6 & 7 oil heater, installed prior to 1983, identified as FCU-11
(7)(D) - (J)	Delete; not emission units
(7)(K)	Two (2) reverse roll coaters with maximum capacity of 36,000 square feet of barrier and damper sheet (filled asphaltic sheet) per hour each
(7)(L) - (N)	Delete; not emission units
(8)(H) - (J)	Delete
(8)(L)	Delete; The conventional oven was removed when the NAVA oven was installed
(8)(M) - (P)	Delete
(8)(R)	One (1) classifier
(8)(S)	One (1) picker
<u>Insert:</u> (8)(T)	One (1) resin distributor
(9)(Q)	One (1) 3.0 million British thermal units per hour (mmBtu/hr) natural gas fired asphalt tank heater, identified as FCU-7; and
(10)(A)&(B)	As presented at Comment 3 and Comment 37 the emission units indicated below are insignificant activities and should be deleted from this list. Notwithstanding this comment the proper listing would be as follows:
(10)(A)	One (1) 200 horsepower fire pump, fueled by #1 diesel fuel and one (1) 285 gallon fuel tank
<u>Insert:</u> (10)(B)	One (1) 110 horsepower emergency fire pump, fueled by #1 diesel fuel and one (1) 275 gallon fuel tank.
(11)	Line 91, identified as L91, constructed in 1978, with a maximum capacity of 3,823 pounds of product per hour, using three (3) baghouses and one (1) thermal oxidizer as control, exhausting to one (1) stack (FCU-2)(new), consisting of the following equipment:

- (11)(A) One (1) existing rebuilt conventional oven (FCU-1) rated at 9 million British thermal units per hour (mmBtu/hr) connected through new modified duct work to a new thermal oxidizer rated at 15 million British thermal units per hour (mmBtu/hr), using a low NOx burner as control, exhausting to one (1) stack (FCU-2(new))
- (11)(B) Four (4) bale breakers
- (11)(C) Delete
- Insert: (11)(D) One (1) fiber opener
- Insert: (11)(E) One (1) Airlay
- Insert: (11)(F) One (1) Classifier
- Insert: (11)(G) One (1) relcaim screen
- Insert: (11)(H) One (1) picker
- Insert: (11)(I) One (1) Resin Distributor
- Insert: (11)(J) Two (2) aspirator tables

The foam part cell process listed below was not identified in the draft Part 70 Operating permit and TSD. The following needs to be added as well as the appropriate conditions and supporting information in "Section D" and the TSD.

- Insert: (12) One foam part cell, identified as Foam Cell Injection Molding, under construction in 1997/1998, with a maximum capacity of 4,273.1 pounds of trimmed parts and scrap per hour, consisting of the following equipment:
- Insert: (12)(A) Two (2) chemical storage tanks, 8,000 gallon capacity each
- Insert: (12)(B) One (1) metering system
- Insert: (12)(C) One (1) robotic injector
- Insert: (12)(D) One (1) nitrogen blank system for the chemical storage tanks

Response to Comment 2:

1. Condition A.2 "Emission Units and Pollution Control Equipment Summary" has been changed to be as follows:

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (1) One (1) hot molding department, identified as HMD, constructed prior to 1978, with a maximum capacity of 2,794 pounds of trimmed parts and scrap per hour, exhausting to three (3) stacks (HV-1, HV-2, and HV-3), consisting of the following equipment:
 - (A) Nine (9) hot molding presses, known as: OTT-7, OTT-4, HAM-12, ERIE-8, HAM-11, HAM-15, OTT-1, HAM-10, and W&W-6
 - (B) Twelve (12) cooling bucks,

~~_____ (C) One (1) carousel,~~

~~_____ (D) Three (3) trim presses, and~~

~~(E)~~(C) Two (2) heaters in the Hot Mold Department with a combined maximum heat input capacity of 12.0 million British thermal units per hour (mmBtu/hr), each installed in 1990, identified as FCU-13 and FCU-14. This equipment is considered to be part of the Indirect Heating and Fuel Combustion Units; **and**

(D) Two (2) mold presses, identified as HETT-1 and HETT-22, each with a maximum capacity of 622 pounds of pads and 10.2 pounds of DOW films per hour, both exhausting to stack HV-1.

(2) One (1) foam part line, identified as F.P. Line, constructed in August, 1995, with a maximum capacity of 1,277 pounds of trimmed parts and scrap per hour, exhausting to two (2) stacks (FP-1 and FP-2), consisting of the following equipment:

(A) One (1) electric oven with maximum throughput of 669 pounds of foam sheet and KDA damper per hour.

~~_____ (B) One (1) heated laminator/cold mold with maximum throughput of 1,149 pounds of foam sheet and KDA damper and barrier per hour, and~~

~~_____ (C) One (1) trim press with maximum throughput of 1,149 pounds of foam sheet, KDA damper and barrier per hour.~~

(3) One (1) CJ line, identified as CJ Line, constructed in 1991, with a maximum capacity of 2,800 pounds of trimmed parts and scrap per hour, exhausting to one (1) stack (FCU-15), that can be used to mold either fully cured pad with barriers with maximum throughput of 2,791 pounds per hour or to mold foam pad with damper with maximum throughput of 1,277 pounds per hour, consisting of the following equipment:

(A) One (1) 2.5 million British thermal units per hour natural gas fueled CJ oven, **and identified as FCU-15.**

~~_____ (B) One (1) mold press molding fully cured pad with barrier with maximum throughput of 2,791 pounds per hour or molding foam pad with damper with maximum throughput of 1,277 pounds per hour.~~

(4) Department 44, identified as D44, constructed in 1981, with a maximum capacity of 5,246 pounds of trimmed parts and scrap per hour, exhausting to one (1) stack (FCU-16), consisting of the following equipment:

~~_____ (A) Six (6) mold presses,~~

~~_____ (B) Five (5) trim presses,~~

~~(C)~~(A) One (1) 2.5 million British thermal units per hour (mmBtu/hr) natural gas fired Line 44 Oven, identified as FCU-16, and

~~(D)~~(B) One (1) 1.0 million British thermal units per hour (mmBtu/hr) natural gas fired Line 44 Oven, **also identified as FCU-16.**

(5) Line 2, identified as L2, constructed in the 1970s, with a maximum capacity of 3,744 pounds of **saturated felt parts and trim scrap** per hour, exhausting to one (1) stack (SV-1), consisting of the following equipment:

- (A) One (1) asphalt saturator with maximum capacity of 15,900 square feet of damper per hour,
- (B) One (1) ~~coating line~~ **coater** #1 using flexcyl with maximum capacity of 15,900 square feet of damper per hour and 63.6 gallons of flexcyl per hour,
- (C) One (1) ~~coating line~~ **coater** #2 using fuller glue with maximum capacity of 15,900 square feet of damper per hour and 31.8 gallons of fuller glue per hour, **and**
- (D) One (1) 4.80 million British thermal units per hour (mmBtu/hr) natural gas fired Line 2 oil heater, installed prior to 1983, identified as FCU-10, ~~and~~.
- ~~(E) One (1) 3.4 million British thermal units per hour (mmBtu/hr) natural gas fired Line 2 asphalt heater, identified as FCU-9.~~
- (6) Lines 6 and 7, identified as L6&7, constructed in the 1960s, with a maximum capacity of 13,200 pounds of products per hour, using twelve (12) baghouses as control, exhausting to twelve (12) stacks (BH-1, BH-2, BH-3, BH-4, BH-5, BH-6, BH-7, BH-8, BH-9, BH-10, BH-11 and BH-12), consisting of the following equipment:
 - ~~(A) Two (2) mixers (A & B),~~
 - ~~(B) One (1) trim belt press,~~
 - ~~(C)(A)~~ One (1) 0.307 million British thermal units per hour natural gas fired predryer infrared oven,
 - ~~(D)(B)~~ One (1) ~~line~~ reverse roll coater with maximum capacity of 21,750 square feet of barrier and damper sheet (filled asphaltic sheet) per hour, **Line 6**
 - ~~(E)(C)~~ One (1) ~~pneumatically loaded~~ bag dump station ~~(#1)~~ **with baghouse BH-12,**
 - ~~(F)(D)~~ ~~One (1) Nine (9) pneumatically loaded silos (#9 - #17), containing: Mica,~~ **maximum throughput of 2,376 pounds per hour with a combined capacity of 46,945 pounds per hour,**
 - ~~(G) One (1) pneumatically loaded silo (#10), containing: SBS Rubber, maximum throughput of 328 pounds per hour,~~
 - ~~(H) One (1) pneumatically loaded silo (#11), containing: Steric Acid, maximum throughput of 99 pounds per hour,~~
 - ~~(I) One (1) pneumatically loaded silo (#12), containing: EVA Resin, maximum throughput of 2,574 pounds per hour,~~
 - ~~(J) One (1) pneumatically loaded silo (#13), containing: Clay, maximum throughput of 5,821 pounds per hour,~~
 - ~~(K) One (1) pneumatically loaded silo (#14), containing: Black Colorant or Barite, maximum throughput of 9,552 pounds per hour,~~
 - ~~(L) Two (2) pneumatically loaded silo (#15 and #16), containing: Clay, maximum throughput of 5,821 pounds per hour each,~~
 - ~~(M)(E)~~ One (1) vacuum receiver, maximum throughput 108 pounds per hour, **Line 6**

~~(N)~~(F) One (1) bag dump station, containing calcium oxide, **with baghouse BH-11**

~~(O) Two (2) weigh bins,~~

~~(P) Two (2) holding bins,~~

~~(Q) Two (2) mixers,~~

~~(R) Two (2) bulk mixers,~~

~~(S) One (1) final mixer,~~

~~(T) Three (3) calendars,~~

~~(U) Two (2) water tanks,~~

~~(V)~~(G) ~~Three (3)~~ **Two (2)** reverse ~~roll coating operations~~ **roll coaters**, with maximum capacity of 13,050 square feet **of barrier sheet (filled asphaltic sheet)** per hour each, **Line 7**

~~(W) Two (2) trim presses,~~

~~(X) One (1) laminator,~~

~~(Y) One (1) embosser,~~

~~(Z) One (1) electricity fueled infrared oven,~~

~~(AA) One (1) cooling conveyor,~~

~~(BB) One (1) trim mixer,~~

~~(CC) One (1) pneumatically loaded silo, containing limestone, storage capacity of 248 tons, and~~

~~(DD)~~(H) One (1) ~~4.50~~ **4.80** million British thermal units per hour (mmBtu/hr) natural gas fired Lines 6 & 7 oil heater, installed prior to 1983, identified as FCU-11.

(7) Line 8, identified as L8, constructed in 1989, with a maximum capacity of 14,000 pounds of products per hour, using thirteen (13) baghouses as control, exhausting to thirteen (13) stacks (BH-13, BH-14, BH-15, BH-16, BH-17, BH-18, BH-19, BH-20, BH-21, BH-22, BH-23, BH-24 and BH-25), consisting of the following equipment:

(A) Two (2) bag dump stations:

(1) One (1) bag dump station (Bag Fill), capacity 4,000 pounds per hour,

(2) One (1) bag dump station (Calcium Oxide), capacity 108 pounds per hour,

(B) One (1) vacuum receiver, capacity 108 pounds per hour,

(C) Ten (10) storage silos with combined capacity of 53,914 pounds per hour,

~~(D) Two (2) weigh bins,~~

~~(E) Two (2) holding bins,~~

~~(F) Five (5) mixers,~~

~~_____ (G) Two (2) calendars,~~

~~_____ (H) One (1) water tank,~~

~~_____ (I) One (1) laminator,~~

~~_____ (J) One (1) embosser,~~

~~(K)~~**(D)** Two (2) reverse ~~rollecoating surface coating operations~~ **roll coaters, with maximum capacity of 36,000 square feet of barrier and damper sheet (filled asphaltic sheet) per hour each,**

~~_____ (L) One (1) electricity fueled infra-red oven,~~

~~_____ (M) One (1) cooling conveyor,~~

~~_____ (N) One (1) trim press, and~~

~~(O)~~**(E)** One (1) 6.00 million British thermal units per hour (mmBtu/hr) natural gas fired Line 8 oil heater, installed in 1991, identified as FCU-12.

(8) Line 92, identified as L92, constructed in 1966, with a maximum capacity of 3,280 pounds of products per hour, using three (3) baghouses and one (1) thermal oxidizer as control, exhausting to one (1) stack (FCU-4), consisting of the following equipment:

(A) One (1) fiberglass receiver, maximum capacity of 1,800 pounds per hour,

(B) One (1) fiberglass opener,

(C) Four (4) virgin cotton fiber bale breakers, maximum capacity of 2,000 pounds per hour each,

(D) One (1) conveyor, maximum capacity of 6,000 pounds per hour,

(E) One (1) fiber blender opener, maximum capacity of 6,000 pounds per hour,

(F) One (1) rotoblender, maximum capacity of 6,000 pounds per hour,

(G) One (1) feed hopper,

~~_____ (H) One (1) air lifter,~~

~~_____ (I) Five (5) bale breakers,~~

~~_____ (J) Two (2) blended fiber openers,~~

~~(K)~~**(H)** One (1) air lay,

~~_____ (L) One (1) conventional oven,~~

~~_____ (M) One (1) automatic dampener,~~

~~_____ (N) One (1) fiber glass receiver,~~

~~_____ (O) One (1) fiber glass opener,~~

~~_____ (P) One (1) rotoblender,~~

- ~~(Q)~~**(I)** One (1) reclaim screen,
 - ~~(R)~~**(J)** ~~Two (2)~~ **One (1)** classifiers,
 - ~~(S)~~**(K)** One (1) pickler **picker**,
 - (L) One (1) resin distributor,**
 - ~~(T)~~**(M)** One (1) 17.85 million British thermal units per hour natural gas fired incinerator,
 - ~~(U)~~**(N)** One (1) 11.20 million British thermal units per hour (mmBtu/hr) natural gas fired Line 92 boiler, installed in 1995, identified as NAVA Oven Boiler, and
 - ~~(V)~~**(O)** One (1) 0.5 million British thermal units per hour (mmBtu/hr) natural gas fired Line 92 Dryer, identified as NAVA Oven.
- (9) One (1) liquid organic storage tank area, identified as VOLS, with a maximum capacity of 227,200 gallons of organic liquid, consisting of the following equipment:
- (A) One (1) fixed roof dome tank, installed in 1989, identified as Line 8 (Flux), storing asphalt, with capacity of 30,000 gallons;
 - (B) One (1) fixed roof dome tank, installed in 1989, identified as Line 8 (Coating), storing asphalt, with capacity of 30,000 gallons;
 - (C) One (1) fixed roof dome tank, installed in 1989, identified as Line 8 B-25, storing asphalt, with capacity of 30,000 gallons;
 - (D) One (1) fixed roof dome tank, installed in 1989, identified as Line 8 Latex #1, storing Latex, with capacity of 3,700 gallons;
 - (E) One (1) fixed roof dome tank, installed in 1989, identified as Line 8 Latex #2, storing Latex, with capacity of 3,700 gallons;
 - (F) One (1) fixed roof dome tank, installed prior to 1970, identified as Process Oil, storing Process Oil, with capacity of 13,500 gallons;
 - (G) One (1) fixed roof dome tank, installed in 1990, identified as Antifreeze #1, storing Antifreeze, with capacity of 1,128 gallons;
 - (H) One (1) fixed roof dome tank, installed in 1990, identified as Antifreeze #2, storing Antifreeze, with capacity of 1,128 gallons;
 - (I) One (1) fixed roof dome tank, installed in 1976, identified as Line 6 & 7 (Flux), storing asphalt, with capacity of 30,455 gallons;
 - (J) One (1) fixed roof dome tank, installed in 1976, identified as Line 6 & 7 (Coating), storing asphalt, with capacity of 30,455 gallons;
 - (K) One (1) fixed roof dome tank, installed in 1976, identified as Line 6 & 7 B-25, storing asphalt, with capacity of 30,455 gallons;
 - (L) One (1) fixed roof dome tank, installed in 1986, identified as Waste Oil, storing Waste Oil, with capacity of 2,970 gallons;
 - (M) One (1) fixed roof dome tank, installed in 1990, identified as HT Oil, storing Heat Transfer Oil, with capacity of 1,128 gallons;

- (N) One (1) fixed roof dome tank, installed in 1990, identified as Lube Oil, storing Lube Oil, with capacity of 1,128 gallons;
 - (O) One (1) fixed roof dome tank, installed in 1976, identified as Line 6 & 7 Latex, storing Latex, with capacity of 3,700 gallons;
 - (P) One (1) 3.0 million British thermal units per hour (mmBtu/hr) natural gas fired asphalt tank heater, identified as FCU-6;
 - (Q) One (1) ~~4.8~~ **3.0** million British thermal units per hour (mmBtu/hr) natural gas fired asphalt tank heater, identified as FCU-7; and
 - (R) One (1) 3.0 million British thermal units per hour (mmBtu/hr) natural gas fired asphalt tank heater, identified as FCU-8.
- ~~(10) One (1) 200 horsepower fire pump, fueled by #1 diesel fuel and one (1) 285 gallon fuel tank.~~
- ~~(11)~~ **(10)** Line 91, identified as L91, constructed in 1978, with a maximum capacity of 3,823 pounds of products per hour, using three (3) baghouses and one (1) thermal oxidizer as control, exhausting to one (1) stack (FCU-2)(**new**), consisting of the following equipment:
- (A) One (1) existing rebuilt conventional oven (**FCU-1**) rated at 9 million British thermal units per hour (mmBtu/hr) connected through new modified duct work to a new thermal oxidizer rated at 15 million British thermal units per hour (mmBtu/hr), using a low NOx burner as control, exhausting to one (1) stack (FCU-2(new)).
 - (B) ~~One (1)~~ **Four (4)** bale breakers;
 - ~~(C) One (1) blending box; and~~
 - ~~(D)~~ **(C)** One (1) feed hopper.
 - (D) One (1) fiber opener,
 - (E) One (1) airway,
 - (F) One (1) classifier,
 - (G) One (1) reclaim screen,
 - (H) One (1) picker,
 - (I) One (1) resin distributor, and
 - (J) Two (2) aspirator tables.
- (11) One (1) foam part cell, identified as Foam Cell Injection Molding, under construction 1997/1998, with a maximum capacity of 4,273.1 pounds of trimmed parts and scrap per hour, consisting of the following equipment:**
- (A) Two (2) chemical storage tanks, 8,000 gallon capacity each,
 - (B) One (1) metering system,
 - (C) One (1) robotic injector, and
 - (D) One (1) nitrogen blank system for chemical storage tanks.

2. The equipment listed in Section D.1 "FACILITY OPERATION CONDITIONS" has been changed to be as follows:

Facility Description [326 IAC 2-7-5(15)]

- (1) One (1) hot molding department, identified as HMD, constructed prior to 1978, with a maximum capacity of 2,794 pounds of trimmed parts and scrap per hour, exhausting to three (3) stacks (HV-1, HV-2, and HV-3), consisting of the following equipment:
- (A) Nine (9) hot molding presses, known as: OTT-7, OTT-4, HAM-12, ERIE-8, HAM-11, HAM-15, OTT-1, HAM-10, and W&W-6
 - (B) Twelve (12) cooling bucks,
 - ~~(C) One (1) carousel,~~
 - ~~(D) Three (3) trim presses, and~~
 - ~~(E)(C)~~ Two (2) heaters in the Hot Mold Department with a combined maximum heat input capacity of 12.0 million British thermal units per hour (mmBtu/hr), each installed in 1990, identified as FCU-13 and FCU-14. This equipment is considered to be part of the Indirect Heating and Fuel Combustion Units; **and**
 - (D) Two (2) mold presses, identified as HETT-1 and HETT-22, each with a maximum capacity of 622 pounds of pads and 10.2 pounds of DOW films per hour, both exhausting to stack HV-1.**
- (2) One (1) foam part line, identified as F.P. Line, constructed in August, 1995, with a maximum capacity of 1,277 pounds of trimmed parts and scrap per hour, exhausting to two (2) stacks (FP-1 and FP-2), consisting of the following equipment:
- (A) One (1) electric oven with maximum throughput of 669 pounds of foam sheet and KDA damper per hour.
 - ~~(B) One (1) heated laminator/cold mold with maximum throughput of 1,149 pounds of foam sheet and KDA damper and barrier per hour, and~~
 - ~~(C) One (1) trim press with maximum throughput of 1,149 pounds of foam sheet, KDA damper and barrier per hour.~~
- (3) One (1) CJ line, identified as CJ Line, constructed in 1991, with a maximum capacity of 2,800 pounds of trimmed parts and scrap per hour, exhausting to one (1) stack (FCU-15), that can be used to mold either fully cured pad with barriers with maximum throughput of 2,791 pounds per hour or to mold foam pad with damper with maximum throughput of 1,277 pounds per hour, consisting of the following equipment:
- (A) One (1) 2.5 million British thermal units per hour natural gas fueled CJ oven **identified as FCU-15**, and
 - ~~(B) One (1) mold press molding fully cured pad with barrier with maximum throughput of 2,791 pounds per hour or molding foam pad with damper with maximum throughput of 1,277 pounds per hour.~~
- (4) Department 44, identified as D44, constructed in 1981, with a maximum capacity of 5,246 pounds of trimmed parts and scrap per hour, exhausting to one (1) stack (FCU-16), consisting of the following equipment:
- ~~(A) Six (6) mold presses,~~
 - ~~(B) Five (5) trim presses,~~
 - ~~(C)(A)~~ One (1) 2.5 million British thermal units per hour (mmBtu/hr) natural gas fired Line 44 Oven, identified as FCU-16, and
 - ~~(D)(B)~~ One (1) 1.0 million British thermal units per hour (mmBtu/hr) natural gas fired Line 44 Oven, **also identified as FCU-16.**

3. The equipment listed in Section D.2 "FACILITY OPERATION CONDITIONS" has been changed to be as follows:

Facility Description [326 IAC 2-7-5(15)]

- (5) Line 2, identified as L2, constructed in the 1970s, with a maximum capacity of 3,744 pounds of **saturated felt parts and trim scrap** per hour, exhausting to one (1) stack (SV-1), consisting of the following equipment:
- (A) One (1) asphalt saturator with maximum capacity of 15,900 square feet of damper per hour,
 - (B) One (1) ~~coating line~~ **coater #1** using flexcryl with maximum capacity of 15,900 square feet of damper per hour and 63.6 gallons of flexcryl per hour,
 - (C) One (1) ~~coating line~~ **coater #2** using fuller glue with maximum capacity of 15,900 square feet of damper per hour and 31.8 gallons of fuller glue per hour,
 - (D) One (1) 4.80 million British thermal units per hour (mmBtu/hr) natural gas fired Line 2 oil heater, installed prior to 1983, identified as FCU-10, and
 - ~~(E) One (1) 3.4 million British thermal units per hour (mmBtu/hr) natural gas fired Line 2 asphalt heater, identified as FCU-9.~~

4. The equipment listed in Section D.3 "FACILITY OPERATION CONDITIONS" has been changed to be as follows:

Facility Description [326 IAC 2-7-5(15)]

- (6) Lines 6 and 7, identified as L6&7, constructed in the 1960s, with a maximum capacity of 13,200 pounds of products per hour, using twelve (12) baghouses as control, exhausting to twelve (12) stacks (BH-1, BH-2, BH-3, BH-4, BH-5, BH-6, BH-7, BH-8, BH-9, BH-10, BH-11 and BH-12), consisting of the following equipment:
- ~~(A) Two (2) mixers (A & B),~~
 - ~~(B) One (1) trim belt press,~~
 - ~~(C)(A) One (1) 0.307 million British thermal units per hour natural gas fired predryer infrared oven,~~
 - ~~(D)(B) One (1) line reverse roll coater with maximum capacity of 21,750 square feet of barrier and damper sheet (filled asphaltic sheet) per hour, Line 6,~~
 - ~~(E)(C) One (1) pneumatically loaded bag dump station (#1) with baghouse BH-12,~~
 - ~~(F)(D) One (1) Nine (9) pneumatically loaded silos (#9 - #17), containing: Mica, maximum throughput of 2,376 pounds per hour with a combined capacity of 46,945 pounds per hour,~~
 - ~~(G) One (1) pneumatically loaded silo (#10), containing: SBS Rubber, maximum throughput of 328 pounds per hour,~~
 - ~~(H) One (1) pneumatically loaded silo (#11), containing: Steric Acid, maximum throughput of 99 pounds per hour,~~
 - ~~(I) One (1) pneumatically loaded silo (#12), containing: EVA Resin, maximum throughput of 2,574 pounds per hour,~~
 - ~~(J) One (1) pneumatically loaded silo (#13), containing: Clay, maximum throughput of 5,824 pounds per hour,~~
 - ~~(K) One (1) pneumatically loaded silo (#14), containing: Black Colorant or Barite, maximum throughput of 9,552 pounds per hour,~~
 - ~~(L) Two (2) pneumatically loaded silo (#15 and #16), containing: Clay, maximum throughput of 5,821 pounds per hour each,~~
 - ~~(M)(E) One (1) vacuum receiver, maximum throughput 108 pounds per hour, Line 6,~~
 - ~~(N)(F) One (1) bag dump station, containing calcium oxide, with baghouse BH-11,~~
 - ~~(O) Two (2) weigh bins,~~
 - ~~(P) Two (2) holding bins,~~
 - ~~(Q) Two (2) mixers,~~
 - ~~(R) Two (2) bulk mixers,~~
 - ~~(S) One (1) final mixer,~~
 - ~~(T) Three (3) calendars,~~
 - ~~(U) Two (2) water tanks,~~
 - ~~(V)(G) Three (3) Two (2) reverse rollcoating operations roll coaters, with maximum capacity of 13,050 square feet of barrier sheet (filled asphaltic sheet) per hour each, Line 7,~~
 - ~~(W) Two (2) trim presses,~~
 - ~~(X) One (1) laminator,~~
 - ~~(Y) One (1) embosser,~~
 - ~~(Z) One (1) electricity fueled infrared oven,~~
 - ~~(AA) One (1) cooling conveyor,~~
 - ~~(BB) One (1) trim mixer,~~
 - ~~(CC) One (1) pneumatically loaded silo, containing limestone, storage capacity of 248 tons, and~~
 - ~~(DD)(H) One (1) 4-50 4.80 million British thermal units per hour (mmBtu/hr) natural gas fired Lines 6 & 7 oil heater, installed prior to 1983, identified as FCU-11.~~

5. The equipment listed in Section D.4 "FACILITY OPERATION CONDITIONS" has been changed to be as follows:

Facility Description [326 IAC 2-7-5(15)]

- (7) Line 8, identified as L8, constructed in 1989, with a maximum capacity of 14,000 pounds of products per hour, using thirteen (13) baghouses as control, exhausting to thirteen (13) stacks (BH-13, BH-14, BH-15, BH-16, BH-17, BH-18, BH-19, BH-20, BH-21, BH-22, BH-23, BH-24 and BH-25), consisting of the following equipment:
- (A) Two (2) bag dump stations:
 - (1) One (1) bag dump station (Bag Fill), capacity 4,000 pounds per hour,
 - (2) One (1) bag dump station (Calcium Oxide), capacity 108 pounds per hour,
 - (B) One (1) vacuum receiver, capacity 108 pounds per hour,
 - (C) Ten (10) storage silos with combined capacity of 53,914 pounds per hour,
 - ~~(D) Two (2) weigh bins,~~
 - ~~(E) Two (2) holding bins,~~
 - ~~(F) Five (5) mixers,~~
 - ~~(G) Two (2) calendars,~~
 - ~~(H) One (1) water tank,~~
 - ~~(I) One (1) laminator,~~
 - ~~(J) One (1) embosser,~~
 - ~~(K)~~**(D)** Two (2) reverse roll coating surface coating operations **roll coaters**, capacity of 36,000 square feet **of barrier and damper sheet (filled asphaltic sheet)** per hour each,
 - ~~(L) One (1) electricity fueled infra-red oven,~~
 - ~~(M) One (1) cooling conveyor,~~
 - ~~(N) One (1) trim press, and~~
 - ~~(O)~~**(E)** One (1) 6.00 million British thermal units per hour (mmBtu/hr) natural gas fired Line 8 oil heater, installed in 1991, identified as FCU-12.

6. The equipment listed in Section D.5 "FACILITY OPERATION CONDITIONS" has been changed to be as follows:

Facility Description [326 IAC 2-7-5(15)]

(8) Line 92, identified as L92, constructed in 1966, with a maximum capacity of 3,280 pounds of products per hour, using three (3) baghouses and one (1) thermal oxidizer as control, exhausting to one (1) stack (FCU-4), consisting of the following equipment:

- (A) One (1) fiberglass receiver, maximum capacity of 1,800 pounds per hour,
- (B) One (1) fiberglass opener,
- (C) Four (4) virgin cotton fiber bale breakers, maximum capacity of 2,000 pounds per hour each,
- (D) One (1) conveyor, maximum capacity of 6,000 pounds per hour,
- (E) One (1) fiber blender opener, maximum capacity of 6,000 pounds per hour,
- (F) One (1) rotoblender, maximum capacity of 6,000 pounds per hour,
- (G) One (1) feed hopper,
- ~~(H) One (1) air lifter,~~
- ~~(I) Five (5) bale breakers,~~
- ~~(J) Two (2) blended fiber openers,~~
- ~~(K)(H) One (1) air lay,~~
- ~~(L) One (1) conventional oven,~~
- ~~(M) One (1) automatic dampener,~~
- ~~(N) One (1) fiber glass receiver,~~
- ~~(O) One (1) fiber glass opener,~~
- ~~(P) One (1) rotoblender,~~
- ~~(Q)(I) One (1) reclaim screen,~~
- ~~(R)(J) Two (2) One (1) classifiers,~~
- ~~(S)(K) One (1) pickler picker,~~
- (L) One (1) resin distributor**
- ~~(T)(M) One (1) 17.85 million British thermal units per hour natural gas fired incinerator,~~
- ~~(U)(N) One (1) 11.20 million British thermal units per hour (mmBtu/hr) natural gas fired Line 92 boiler, installed in 1995, identified as NAVA Oven Boiler, and~~
- ~~(V)(O) One (1) 0.5 million British thermal units per hour (mmBtu/hr) natural gas fired Line 92 Dryer, identified as NAVA Oven.~~

~~(44)(10)~~ Line 91, identified as L91, constructed in 1978, with a maximum capacity of 3,823 pounds of products per hour, using three (3) baghouses and one (1) thermal oxidizer as control, exhausting to one (1) stack (FCU-2)(new), consisting of the following equipment:

- (A) One (1) existing rebuilt conventional oven **(FCU-1)** rated at 9 million British thermal units per hour (mmBtu/hr) connected through new modified duct work to a new thermal oxidizer rated at 15 million British thermal units per hour (mmBtu/hr), using a low NOx burner as control, exhausting to one (1) stack (FCU-2(new)).
- ~~(B) One (1) Four (4) bale breakers;~~
- ~~(C) One (1) blending box; and~~
- ~~(D)(C) One (1) feed hopper.~~
- (D) One (1) fiber opener,**
- (E) One (1) airlay,**
- (F) One (1) classifier,**
- (G) One (1) reclaim screen,**
- (H) One (1) picker,**
- (I) One (1) resin distributor, and**
- (J) Two (2) aspirator tables.**

7. The equipment listed in Section D.6 "FACILITY OPERATION CONDITIONS" has been changed to be as follows:

Facility Description [326 IAC 2-7-5(15)]

- (9) One (1) liquid organic storage tank area, identified as VOLS, with a maximum capacity of 227,200 gallons of organic liquid, consisting of the following equipment:
- (A) One (1) fixed roof dome tank, installed in 1989, identified as Line 8 (Flux), storing asphalt, with capacity of 30,000 gallons;
 - (B) One (1) fixed roof dome tank, installed in 1989, identified as Line 8 (Coating), storing asphalt, with capacity of 30,000 gallons;
 - (C) One (1) fixed roof dome tank, installed in 1989, identified as Line 8 B-25, storing asphalt, with capacity of 30,000 gallons;
 - (D) One (1) fixed roof dome tank, installed in 1989, identified as Line 8 Latex #1, storing Latex, with capacity of 3,700 gallons;
 - (E) One (1) fixed roof dome tank, installed in 1989, identified as Line 8 Latex #2, storing Latex, with capacity of 3,700 gallons;
 - (F) One (1) fixed roof dome tank, installed prior to 1970, identified as Process Oil, storing Process Oil, with capacity of 13,500 gallons;
 - (G) One (1) fixed roof dome tank, installed in 1990, identified as Antifreeze #1, storing Antifreeze, with capacity of 1,128 gallons;
 - (H) One (1) fixed roof dome tank, installed in 1990, identified as Antifreeze #2, storing Antifreeze, with capacity of 1,128 gallons;
 - (I) One (1) fixed roof dome tank, installed in 1976, identified as Line 6 & 7 (Flux), storing asphalt, with capacity of 30,455 gallons;
 - (J) One (1) fixed roof dome tank, installed in 1976, identified as Line 6 & 7 (Coating), storing asphalt, with capacity of 30,455 gallons;
 - (K) One (1) fixed roof dome tank, installed in 1976, identified as Line 6 & 7 B-25, storing asphalt, with capacity of 30,455 gallons;
 - (L) One (1) fixed roof dome tank, installed in 1986, identified as Waste Oil, storing Waste Oil, with capacity of 2,970 gallons;
 - (M) One (1) fixed roof dome tank, installed in 1990, identified as HT Oil, storing Heat Transfer Oil, with capacity of 1,128 gallons;
 - (N) One (1) fixed roof dome tank, installed in 1990, identified as Lube Oil, storing Lube Oil, with capacity of 1,128 gallons;
 - (O) One (1) fixed roof dome tank, installed in 1976, identified as Line 6 & 7 Latex, storing Latex, with capacity of 3,700 gallons;
 - (P) One (1) 3.0 million British thermal units per hour (mmBtu/hr) natural gas fired asphalt tank heater, identified as FCU-6;
 - (Q) One (1) ~~4-8~~ **3.0** million British thermal units per hour (mmBtu/hr) natural gas fired asphalt tank heater, identified as FCU-7; and
 - (R) One (1) 3.0 million British thermal units per hour (mmBtu/hr) natural gas fired asphalt tank heater, identified as FCU-8.
- (11) **One (1) foam part cell, identified as Foam Cell Injection Molding, under construction in 1997/1998, with a maximum capacity of 4,273.1 pounds of trimmed parts and scrap per hour, consisting of the following equipment:**
- (A) **Two (2) chemical storage tanks, 8,000 gallon capacity each,**
 - (B) **One (1) metering system,**
 - (C) **One (1) robotic injector, and**
 - (D) **One (1) nitrogen blank system for the chemical storage tanks.**

8. The Technical Support Document (TSD) should also reflect these changes. However, the TSD is not physically changed after public notice. The changes are noted here in the Addendum to the Technical Support Document.

Comment 3:

Please include all insignificant activities listed in the application and delineated in the TSD, as follows:

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (1) Fifty-two (52) natural gas fired space heaters and four (4) air makeup units with a combined maximum heat input capacity of 54.75 million British thermal units per hour (mmBtu/hr), each with individual heat capacities less than ten (10) million British thermal units. This equipment is considered to be part of the Direct Heating and Fuel Combustion Units.
- (2) VOC and HAP vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (3) Application of oils, greases, lubricants, or other nonvolatile materials applied as temporary protective coatings.
- (4) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (5) Closed loop heating and cooling systems.
- (6) Water based adhesives that are less than or equal to 5% by volume of VOC's excluding HAPs.
- (7) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (8) Paved and unpaved roads and parking lots with public access.
- (9) Blowdown for any of the following: sight glass, boiler, compressors, pumps, and cooling tower, and
- (10) A laboratory as defined in 326 IAC 2-7-1(21)(D).

Insert: (11) One (1) 200 horsepower primary fire pump, fueled by #1 diesel fuel and one (1) 285 gallon fuel tank.

Insert: (12) One (1) 110 horsepower emergency fire pump, fueled by #1 diesel fuel and one (1) 275 gallon fuel tank.

Response to Comment 3:

While the Title V Operating Permit rule requires that applications list all points of emissions (326 IAC 2-7-4 Permit Application) with additional provisions relating to insignificant and trivial activities (326 IAC 2-7-1 Definitions), the rule requires that the permit identify all applicable requirements (326 IAC 2-7-5 Permit Content). The OAM ordinarily includes insignificant activities only as necessary to identify specific applicable requirements. During the development of the model Title V Operating Permit and the subsequent implementation of the program, this approach has been the consensus recommendation of both the regulated community and the OAM. In many cases future additions or deletions of insignificant activities will not require a modification of this permit. It was felt that there would be less confusion if the permit did not give the impression that the rules required every insignificant activity to be listed in the permit. Nonetheless, the OAM has added these activities to this permit in response to your request. This has no effect on future activities regarding insignificant activities.

Condition A.3. "Specifically Regulated Insignificant Activities" has been changed to be as follows:

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (1) One (1) 8.38 million British thermal units per hour (mmBtu/hr) natural gas fired boiler, installed prior to 1983, identified as FCU-5; ~~and~~
- (2) VOC and HAP storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than or equal to 12,000 gallons;
- (3) **Fifty-two (52) natural gas fired space heaters and four (4) air makeup units with a combined maximum heat input capacity of 54.75 million British thermal units per hour (mmBtu/hr), each with individual heat capacities less than ten (10) million British thermal units. This equipment is considered to be part of the Direct Heating and Fuel Combustion Units;**
- (4) VOC and HAP vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids;
- (5) Application of oils, greases, lubricants, or other nonvolatile materials applied as temporary protective coatings;
- (6) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment;
- (7) Closed loop heating and cooling systems;
- (8) Water based adhesives that are less than or equal to 5% by volume of VOC's excluding HAPs;
- (9) Replacement of repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment;
- (10) Paved and unpaved roads and parking lots with public access;
- (11) Blowdown for any of the following: sight glass, boiler, compressors, pumps, and cooling towers;
- (12) A laboratory as defined in 326 IAC 2-7-1(20)(C);
- (13) One (1) 200 horsepower primary fire pump, fueled by #1 diesel fuel and one (1) 285 gallon fuel tank; and
- (14) One (1) 110 horsepower emergency fire pump, fueled by #1 diesel fuel and one (1) 275 gallon fuel tank.

Comment 4:

Condition B.11

- (a) The time period for coverage of the initial annual compliance certification report should be clearly stated to cover only from the date of final permit issuance through December 31 of the same year.

- (b) Because the annual compliance certification report must include “[t]he identification of each term or condition of this permit that is the basis of the certification,” IDEM should provide an itemization of the specific terms and conditions “including emission limitations, standards, or work practices” which are necessary to submit a compliance certification report.

Response to Comment 4:

Condition B.11(a) “Annual Compliance Certification” has been changed to be as follows:

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source’s compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year **(the first report shall cover the time period from the date of issuance of the Part 70 Permit to December 31)**, and shall be submitted in letter form no later than April 15 of each year to:

Condition B.11(c) “Annual Compliance Certification” will not be changed because the annual compliance certification report should include all requirements listed in the Part 70 Operating Permit. These requirements are different for every source. It is IDEM, OAM’s suggestion to list each permit condition and indicate compliance or noncompliance.

Comment 5:

Condition B.27

Rieter Automotive requests that the Credible Evidence rule be removed in its entirety from the draft permit because it lacks statutory authority and is an unlawful revision of substantive standards. The Credible Evidence rule lacks statutory authority because EPA did not conduct a rulemaking for each of the standards to which the credible evidence rule may be applied. Changing the means of testing compliance amounts to changing the standards themselves.

The Credible Evidence rules states in part that “other credible evidence may be used to demonstrate compliance or non-compliance.” Because nothing in the rule itself defines or limits the possible kinds of evidence encompassed within the phrase “credible evidence,” any source subjected to this kind of broad overreaching power will be jeopardized by its execution. The quality threshold of the information that could be used to initiate an enforcement proceeding or citizen suit would be far below the type of stack test data currently authorized. It is alarming that such quality reduced information could be used as the basis for enforcement proceedings even though a stack test would show compliance, or the alleged violations are minimal, or the alleged violations are brief in nature. Indeed, the Credible Evidence rule increases the stringency of the underlying standards or conditions beyond their written language.

Response to Comment 5:

IDEM, OAM now believes that this condition is not necessary and has removed it from the final permit. The issues regarding credible evidence can be adequately addressed during a showing of compliance or noncompliance. Indiana’s statutes, and the rules adopted under their authority, govern the admissibility of evidence in any proceeding. Indiana law contains no provisions that limit the use of any credible evidence and an explicit statement is not required in the permit. Condition B.27 “Credible Evidence” has been deleted from the final permit as follows:

~~B.27 — Credible Evidence [326 IAC 2-7-5(3)][62 Federal Register 8313][326 IAC 2-7-6]~~

~~Notwithstanding the conditions of this permit that state specific methods that may be used to assess compliance or noncompliance with applicable requirements, other credible evidence may be used to demonstrate compliance or non-compliance.~~

Comment 6:

Condition C.6

326 IAC 6-1 applies only to nonattainment areas for particulate matter. Indeed the title applied to 326 IAC 6-1 "Nonattainment Area Limitations." The part of Lake County south of U.S. 30 has never been designated nonattainment for either TSP or PM₁₀. In addition, 326 IAC 6-1-11.1 is not applicable to this source because the potential to emit fugitive particulate matter is less than 5 tons per year. Because this rule does not apply, this condition has no basis in rule and should be removed in its entirety.

Response to Comment 6:

Condition C.6 "Fugitive Dust Emissions" has been deleted from the final permit as follows. The remaining conditions of this section have been renumbered:

~~C.6 — Fugitive Dust Emissions [326 IAC 6-1-11.1]~~

~~The Permittee shall be in violation of 326 IAC 6-1-11.1 (Lake County Fugitive Particulate Matter Control Requirements), if the opacity of fugitive particulate emissions exceeds ten percent (10%). Compliance with this opacity limit shall be achieved by controlling fugitive particulate matter emissions according to the plan submitted on September 20, 1996. The plan consists of:~~

~~(a) — Controlling all particulate matter emissions via baghouses. Therefore, there are no fugitive particulate matter emissions.~~

Comment 7:

Condition C.12(a)

The last sentence should be clarified for consistency to include the phrase "to the extent practicable," as follows:

In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented *to the extent practicable* at intervals no less than one (1) hour until such time as the continuous monitor is back in operation.

Response to Comment 7:

This source does not have any continuous monitoring equipment, therefore, this sentence would not be applicable to any facilities located at this source. This condition is a standard condition and therefore, cannot be removed from the Part 70 Operating Permit. There will be no changes to this condition in the final permit due to this comment.

Comment 8:

Condition C.17

To the extent that the compliance monitoring requirements included in this draft Part 70 Operating Permit are based on an unpromulgated guidance document that is being applied as if it were law and to the extent the requirements are in addition to or differing in terms of applicability or detail from the recently promulgated EPA CAM rule, IDEM is overreaching its authority and has failed to go through the proper rulemaking process including the opportunity for public comment. Because IDEM is requiring compliance monitoring before the EPA CAM requirements go into effect, Rieter Automotive could have to revise its compliance monitoring programs developed pursuant to this draft permit once CAM applies. Furthermore, a competitive disadvantage is being created because other Midwestern states have not included excessive and detailed compliance monitoring terms in their permits. Rieter Automotive requests that the compliance monitoring requirements of this draft permit be no more extensive than is contained in the EPA CAM rule.

Response to Comment 8:

IDEM has worked with members of the Clean Air Act Advisory Council's Permit Committee, Indiana Manufacturing Association, Indiana Chamber of Commerce and individual applicants regarding the Preventive Maintenance Plan, the Compliance Monitoring Plan and the Compliance Response Plan. IDEM has clarified the preventive maintenance requirements by working with sources on draft language over the past two years. The plans are fully supported by rules promulgated by the Air Pollution Control Board. The plans are the mechanism each permittee will use to verify continuous compliance with its permit and the applicable rules and will form the basis for each permittee's Annual Compliance Certification. Each permittee's ability to verify continuous compliance with its air pollution control requirements is a central goal of the Part 70 permit program.

The regulatory authority for and the essential elements of a compliance monitoring plan were clarified in IDEM's Compliance Monitoring Guidance, in May 1996. IDEM originally placed all the preventive maintenance requirements in the permit section titled "Preventive Maintenance Plan." Under that section the permittee's Preventive Maintenance Plan (PMP) had to set out requirements for the inspection and maintenance of equipment both on a routine basis and in response to monitoring. Routine maintenance was a set schedule of inspections and maintenance of the equipment. The second was inspection and maintenance in response to monitoring that showed that the equipment was not operating in its normal range. This monitoring would indicate that maintenance was required to prevent the exceedance of an emission limit or other permit requirement. The maintenance plan was to set out the "corrective actions" that the permittee would take in the event an inspection indicated an "out of specification situation", and also set out the time frame for taking the corrective action. In addition, the PMP had to include a schedule for devising additional corrective actions for out of compliance situations that the source had not predicted in the PMP. All these plans, actions and schedules were part of the Preventive Maintenance Plan, with the purpose of maintaining the permittee's equipment so that an exceedance of an emission limit or violation of other permit requirements could be prevented.

After issuing the first draft Title V permits on public notice in July of 1997, IDEM received comments from members of the regulated community regarding many of the draft permit terms, including the PMP requirements. One suggestion was that the corrective action and related schedule requirements be removed from the PMP requirement and placed into some other requirement in the permit. This suggestion was based, in some part, on the desire that a permittee's maintenance staff handle the routine maintenance of the equipment, and a permittee's environmental compliance and engineering staff handle the compliance monitoring and steps taken in reaction to an indication that the facility required maintenance to prevent an environmental problem.

IDEM carefully considered this suggestion and agreed to separate the "corrective actions" and related schedule requirements from the PMP. These requirements were placed into a separate requirement, which IDEM named the Compliance Response Plan (CRP). In response to another comment, IDEM changed the name of the "corrective actions" to "response steps." That is how the present CRP requirements became separated from the PMP requirement, and acquired their distinctive nomenclature.

Other comment sought clarification on whether the failure to follow the PMP was violation of the permit. The concern was that a permittee's PMP might call for the permittee to have, for example, three "widget" replacement parts in inventory. If one widget was taken from inventory for use in maintenance, then the permittee might be in violation of the PMP, since there were no longer three widgets in inventory, as required by the PMP. Comments also expressed a view that if a maintenance employee was unexpectedly delayed in making the inspection under the PMP's schedule, for example by the employee's sudden illness, another permit violation could occur, even though the equipment was still functioning properly.

IDEM considered the comments and revised the PMP requirement so that if the permittee fails to follow its PMP, a permit violation will occur only if the lack of proper maintenance causes or contributes to a violation of any limitation on emissions or potential to emit. This was also the second basis for separating the compliance maintenance response steps from the PMP and placing them in the Compliance Response Plan (CRP). Unlike the PMP, the permittee must conduct the required monitoring and take any response steps as set out in the CRP (unless otherwise excused) or a permit violation will occur.

The Compliance Monitoring Plan is made up of the PMP, the CRP, the compliance monitoring and compliance determination requirements in section D of the permit, and the record keeping and reporting requirements in sections C and D. IDEM decided to list all these requirements under this new name, the Compliance Monitoring Plan (CMP), to distinguish them from the PMP requirements. The section D provisions set out which facilities must comply with the CMP requirement. The authority for the CMP provisions is found at 326 IAC 2-7-5(1), 2-7-5(3), 2-7-5(13), 2-7-6(1), 1-6-3 and 1-6-5.

Most permittees already have a plan for conducting preventive maintenance for the emission units and control devices. It is simply a good business practice to have identified the specific personnel whose job duties include inspecting, maintaining and repairing the emission control devices. The emission unit equipment and the emission control equipment may be covered by a written recommendation from the manufacturer set out schedules for the regular inspection and maintenance of the equipment. The permittee will usually have adopted an inspection and maintenance schedule that works for its particular equipment and process in order to keep equipment downtime to a minimum and achieve environmental compliance. The manufacturer may also have indicated, or the permittee may know from experience, what replacement parts should be kept on hand. The permittee may already keep sufficient spare parts on hand so that if a replacement is needed, it can be quickly installed, without a delay in the permittee's business activities and without an environmental violation. For the most part, the PMP can be created by combining present business practices and equipment manufacturer guidance into one document, the Preventive Maintenance Plan (PMP).

The permittee has 90 days to prepare, maintain and implement the PMP. IDEM is not going to draft the PMP. Permittees know their processes and equipment extremely well and are in the best position to draft the PMP. IDEM's air inspectors and permit staff will be available to assist the permittee with any questions about the PMP. IDEM may request a copy of the PMP to review and approve.

The Preventive Maintenance Plan requirement must be included in every applicable Part 70 permit pursuant to 326 IAC 2-7-5(13). This rule refers back to the Preventive Maintenance Plan requirement as described in 326 IAC 1-6-3. This Preventive Maintenance Plan rule sets out the requirements for:

- (1) Identification of the individuals responsible for inspecting, maintaining and repairing the emission control equipment (326 IAC 1-6-3(a)(1)),
- (2) The description of the items or conditions in the facility that will be inspected and the inspection schedule for said items or conditions (326 IAC 1-6-3(a)(2)), and
- (3) The identification and quantification of the replacement parts for the facility which the permittee will maintain in inventory for quick replacement (326 IAC 1-6-3(a)(2)).

It is clear from the structure of the wording in 326 IAC 1-6-3 that the PMP requirement affects the entirety of the applicable facilities. Only 326 IAC 1-6-3(a)(1) is limited, in that it requires identification of the personnel in charge of only the emission control equipment, not any other facility equipment. The commissioner may require changes in the maintenance plan to reduce excessive malfunctions in any control device or combustion or process equipment under 326 IAC 1-6-5.

The CRP requirement of response steps and schedule requirements are another example of documenting procedures most permittees already have developed in the course of good business practices and the prevention of environmental problems. Equipment will often arrive with the manufacturer's trouble shooting guide. It will specify the steps to take when the equipment is not functioning correctly. The steps may involve some initial checking of the system to locate the exact cause, and other steps to place the system back into proper working order. Using the trouble shooting guide and the permittee's own experience with the equipment, the steps are taken in order and as scheduled until the problem is fixed.

A permittee will likely already have a procedure to follow when an unforeseen problem situation occurs. The procedure may list the staff to contact in order to select a course of action, or other step, before the equipment problem creates an environmental violation or interrupts the permittee's business process.

The Compliance Monitoring Plan (CMP) is consistent with IDEM's Compliance Monitoring Guidance released in May of 1996. The guidance discusses corrective action plans setting out the steps to take when compliance monitoring shows an out of range reading. Some of the terminology has changed, as a result of the comments from regulated sources, but the requirements in the permit do not conflict with the guidance.

Comment 9:

Conditions D.1.2, D.2.4, D.3.3, D.4.4, D.6.2, D.7.3, D.8.2

IDEM is overreaching its authority pursuant to 326 IAC 2-1-4(f) by expanding the regulatory language to require compliance testing "at any specific time." The phrase "at any specific time" should be deleted from the Section D Testing Requirements noted above.

Response to Comment 9:

Pursuant to 326 IAC 2-7-6(6) "Compliance Requirements", the Commissioner shall implement any provisions necessary to ensure compliance with the Part 70 Operating Permit requirements. If there is a question of a facility's compliance status, the Commissioner may require a stack test. There will be no changes to this condition in the final permit due to this comment.

Comment 10:

Condition D.1.3

As was shown in the permit application, all four of these lines (HMD, F.P., CJ and D44) complied with 326 IAC 6-3 without any need or requirement for emissions reductions. As the equation used in 326 IAC 6-3-2 is nonlinear and becoming more stringent as process weight rate increases while emissions increase in throughput, the application evaluated emissions at the maximum rated capacity of the lines. The only way that emissions could increase beyond the limits stated in Condition D.1.1 is if additional equipment is added or if a malfunction/deviation occurred. In both cases the emissions exceedance would be documented by means other than daily emissions monitoring. Condition B.13, B.16, B.17, and B.19 cover these conditions. There are other processes in industry that comply with a particulate rule without emission controls (electric arc welding, pouring operations in foundries, and natural gas fired combustion equipment, for example), and compliance monitoring conditions are not customarily imposed on these processes, even though their allowable emissions are greater than in these lines. This disparity in the imposition of compliance monitoring conditions is discriminatory on its face. Why should these processes be singled out for more stringent conditions? This excessive monitoring requirement is expensive and burdensome without any additional level of environmental protection. Rieter Automotive requests that this condition be deleted in its entirety.

Response to Comment 10:

Upon further review, IDEM, OAM has determined that the emission units at the source are not subject to the requirements of 326 IAC 6-3-2 (Process Operations), rather, the emission units at the source should be subject to the requirements of 326 IAC 6-1-2(a) (Particulate Matter Emission Limitations). The allowable emission limitations are now considered to be below the applicability thresholds for compliance monitoring. Therefore, the compliance monitoring requirements for these emission units have been removed from the final permit.

Condition D.1.3 (now renumbered Condition D.1.4) "Visible Emissions Notations" has been changed to be as follows:

D.1.34 ~~Visible Emissions Notations~~ Monitoring

- ~~———— (a) ——— Daily visible emission notations of the one (1) hot mold department, one (1) foam part line, one (1) CJ Line and Department 44 stack exhausts shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal. —~~
- ~~———— (b) ——— For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. —~~
- ~~———— (c) ——— In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. —~~
- ~~———— (d) ——— A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. —~~
- ~~———— (e) ——— The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. —~~

Monitoring of these facilities is not specifically required by this permit. However, any change or modification to these facilities as specified in 326 IAC 2-1, may require this facility to have monitoring requirements.

Comment 11:

Condition D.1.4

As shown in comment #10 to Section D.1.3, the daily monitoring is not beneficial nor required. Likewise, the record keeping supporting it should not be required. Record keeping without any environmental benefit nor regulatory requirement is onerous and burdensome. Rieter Automotive requests that this condition be deleted in its entirety.

Response to Comment 11:

Condition D.1.4 "Record Keeping Requirements" has been deleted from the final permit as follows:

~~Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]~~

~~D.1.5 Record Keeping Requirements~~

- ~~———— (a) ——— To document compliance with Condition D.1.4, the Permittee shall maintain records of daily visible emission notations of the one (1) hot mold department, one (1) foam part line, one (1) CJ Line and Department 44 stack exhausts. —~~
- ~~———— (b) ——— All records shall be maintained in accordance with Section C General Record Keeping Requirements, of this permit. —~~

Comment 12:

Condition D.2.2

All of the 326 IAC 6-1 applies only to nonattainment areas for particulate matter. Indeed the title applied to 326 IAC 6-1 is "Nonattainment Area Limitations." The part of Lake County south of U.S. 30 has never been designated as nonattainment for either TSP or PM₁₀. Furthermore, the Rieter Automotive asphalt saturator located in Line 2 is not listed among the source applicable to 326 IAC 6-1-10.1. Although the Rieter Automotive source was formerly the location for Globe Industries, the Globe Industries listed in 326 IAC 6-1-10.1 refers to a Whiting, Indiana location which is also in Lake County but is north of U.S. 30. As this rule does not apply to the Rieter Automotive source, this condition has no basis in rule and should be removed.

Response to Comment 12:

326 IAC 6-1 applies to many areas that are not nonattainment areas for particulate matter. For example, Howard County, Wayne County and Dearborn Counties are also attainment areas, yet the sources located in these counties are subject to this rule. However, since this source is not specifically listed in 326 IAC 6-1-10.1 and the actual Particulate Matter (PM) emissions are greater than ten (10) tons per year, this source would be subject to the requirements of 326 IAC 6-1-2(a). Therefore, the requirements of 326 IAC 6-3-2(c) would not apply.

1. Condition D.1.1 "Particulate Matter" has been changed to be as follows:

D.1.1 Particulate Matter (PM) ~~[326 IAC 6-3-2(c)]~~ **[326 IAC 6-1-2(a)]**

Pursuant to 326 IAC ~~6-3-2 (Process Operations)~~ **6-1-2(a) (Particulate Emission Limitations)**:

- (a) The PM from the one (1) hot molding department shall not exceed ~~5.12 pounds per hour~~ **0.03 grains per dry standard cubic foot. See the following table for the equivalent pound per hour emissions:**

Emission Units/Stack	Flow Rate (acfm)	326 IAC 6-1-2(a) limitation (gr/dscf)	Equivalent limit in pounds per hour
HMP-4, HMP-5, HMP-6, HMP-7 / HV-2	70,467	0.03	18.12
HMP-1, HMP-2, HMP-3, HETT-1, HETT-2 / HV-1	22,076	0.03	5.67
HMP-8, HMP-9 / HV-3	54,083	0.03	13.90

- (b) The PM from the one (1) foam part line shall not exceed ~~3.03 pounds per hour~~ **0.03 grains per dry standard cubic foot. See the following table for the equivalent pound per hour emissions:**

Emission Units/Stack	Flow Rate (acfm)	326 IAC 6-1-2(a) limitation (gr/dscf)	Equivalent limit in pounds per hour
Electric Oven / FP-1	4,000	0.03	1.02
Electric Oven / FP-2	4,000	0.03	1.02

- (c) The PM from the one (1) CJ Line shall not exceed ~~5.13 pounds per hour~~ **0.03 grains per dry standard cubic foot. See the following table for the equivalent pound per hour emissions:**

Emission Units/Stack	Flow Rate (acfm)	326 IAC 6-1-2(a) limitation (gr/dscf)	Equivalent limit in pounds per hour
CJ Oven / FCU-15	4,000	0.03	1.02

- (d) The PM from Department 44 shall not exceed ~~7.82 pounds per hour~~ **0.03 grains per dry standard cubic foot. See the following table for the equivalent pound per hour emissions:**

Emission Units/Stack	Flow Rate (acfm)	326 IAC 6-1-2(a) limitation (gr/dscf)	Equivalent limit in pounds per hour
Line 44 Oven / FCU-16	1,000	0.03	0.25

These limitations are based on the following equation:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

2. Condition D.2.1 "Particulate Matter" has been changed to be as follows:

D.2.1 Particulate Matter (PM) ~~[326 IAC 6-3-2(c)]~~ [326 IAC 6-1-2(a)]

Pursuant to 326 IAC 6-3-2(c) (Process Operations) **6-1-2(a) (Particulate Emission Limitations)**, the PM from Line 2 shall not exceed ~~6.24 pounds per hour~~. The pounds per hour limitation was calculated with the following equation: **0.03 grains per dry standard cubic foot. See the following table for the equivalent pound per hour emissions:**

Emission Units/Stack	Flow Rate (acfm)	326 IAC 6-1-2(a) limitation (gr/dscf)	Equivalent limit in pounds per hour
Line 2 Asphalt Saturator / SV-1	2,760	0.03	0.70

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

3. Condition D.2.2 "Particulate Matter" has been deleted from the final permit as follows. The remaining conditions of this section have been renumbered:

~~D.2.2 Particulate Matter (PM) [326 IAC 6-1-10.1]~~

~~Pursuant to 326 IAC 6-1-10.1 (Lake County PM₁₀ Emission Requirements), the one (1) asphalt saturator located in Line 2 shall be limited to 0.60 pounds PM₁₀ per ton of product and 4.5 pounds of total suspended particulates (TSP) per hour.~~

4. Condition D.3.1 "Particulate Matter" has been changed to be as follows:

D.3.1 Particulate Matter (PM) ~~[326 IAC 6-3-2(c)]~~ [326 IAC 6-1-2(a)]

Pursuant to 326 IAC 6-3-2(c) (Process Operations) **6-1-2(a) (Particulate Emissions Limitations)**, the PM from the bulk handling operations in Lines 6 & 7 shall not exceed ~~14.51 pounds per hour~~. **0.03 grains per dry standard cubic foot. See the following table for the equivalent pound per hour emissions:**

Emission Units/Stack	Flow Rate (acfm)	326 IAC 6-1-2(a) limitation (gr/dscf)	Equivalent limit in pounds per hour
Bag Fill / BH-1	600	0.03	0.15
Bag Fill / BH-2	600	0.03	0.15
Bag Fill / BH-3	600	0.03	0.15
Bag Fill / BH-4	600	0.03	0.15
Truck Fill / BH-5	600	0.03	0.15
Truck Fill / BH-6	600	0.03	0.15
Truck Fill / BH-7	600	0.03	0.15
Truck Fill / BH-8	600	0.03	0.15
Truck Fill / BH-9	600	0.03	0.15
Vacuum Receiver / BH-10	600	0.03	0.15
Bag Dump Station / BH-11	1,000	0.03	0.25
Bag Dump Station / BH-12	1,000	0.03	0.25

— The pounds per hour limitation was calculated with the following equation:

— Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

5. Condition D.4.1 "Particulate Matter" has been changed to be as follows:

D.4.1 Particulate Matter (PM) [326 IAC 6-3-2(e)] [326 IAC 6-1-2(a)]

Pursuant to 326 IAC 6-3-2 (Process Operations) **6-1-2(a) (Particulate Emissions Limitations)**, the PM from the granular material handling operations in Line 8 shall not exceed **15.10 pounds per hour** established as E in the following formula: **0.03 grains per dry standard cubic foot. See the following table for the equivalent pound per hour emissions:**

Emission Units/Stack	Flow Rate (acfm)	326 IAC 6-1-2(a) limitation (gr/dscf)	Equivalent limit in pounds per hour
Bag Fill / BH-13	600	0.03	0.15
Bag Fill / BH-14	600	0.03	0.15
Bag Fill / BH-15	600	0.03	0.15
Bag Fill / BH-16	600	0.03	0.15
Bag Fill / BH-17	600	0.03	0.15
Truck Fill / BH-18	600	0.03	0.15
Truck Fill / BH-19	600	0.03	0.15
Truck Fill / BH-20	600	0.03	0.15
Truck Fill / BH-21	600	0.03	0.15
Truck Fill / BH-22	600	0.03	0.15
Bag Dump Station / BH-23	1,000	0.03	0.25
Vacuum Receiver / BH-24	600	0.03	0.15
Bag Dump Station / BH-25	1,000	0.03	0.25

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

6. Condition D.5.4 (now renumbered Condition D.5.3) "Particulate Matter" has been changed to be as follows:

D.5.43 Particulate Matter (PM) [326 IAC 6-3-2] [326 IAC 6-1-2(a)]

Pursuant to 326 IAC 6-3-2 (Process Operations) **6-1-2(a) (Particulate Emissions Limitations)**, the PM from the **Line 91, Line 92, fiber prep and resin recycle** shall not exceed 5.74 pounds per hour and the PM from Line 92 shall not exceed 6.32 pounds per hour as established as E in the following formula: **0.03 grains per dry standard cubic foot. See the following table for the equivalent pound per hour emissions:**

Emission Units/Stack	Flow Rate (acfm)	326 IAC 6-1-2(a) limitation (gr/dscf)	Equivalent limit in pounds per hour
Line 91 / FCU-2	6,000	0.03	1.54
Line 92 / FCU-4	16,704	0.03	4.29

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

Comment 13:

Condition D.2.3

The condition stated for fabric and vinyl coating operations is an inaccurate restatement of 326 IAC 8-2-11 because it does not specify that the VOC content limit 2.9 pounds of VOC per gallon of coating excluding water is for a fabric coating line and that a separate limit of 4.8 pounds of VOC per gallon excluding water is applicable to a vinyl coating line. Please make this correction.

Response to Comment 13:

Condition D.2.3 "Volatile Organic Compound" has been changed to be as follows:

D.2.3 Volatile Organic Compound (VOC) [326 IAC 8-2-11]

Pursuant to 326 IAC 8-2-11 (Fabric and Vinyl Coating Operations), no owner or operator of a facility engaged in the surface coating of fabric or vinyl may cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds in excess of 2.9 pounds of VOC per gallon of coating excluding water, delivered to coating applicator **when coating fabric and 4.8 pounds of VOC per gallon of coating excluding water, delivered to the coating applicator when coating vinyl.**

Comment 14:

Condition D.2.4

Remove reference to D.2.2 Particulate Matter (PM) [326 IAC 6-1-10.1] as that rule does not apply to the Rieter Automotive Source. See Comment 11.

Response to Comment 14:

Condition D.2.4 "Testing Requirements" has been changed to be as follows:

D.2.4 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing ~~at any specific time~~ when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the Particulate Matter (PM) and Volatile Organic Compound (VOC) limits specified in Conditions D.2.1; **and D.2.2; and D.2.3** shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Comment 15:

Condition D.2.6

As was shown in the permit application, all parts of Line 2 comply with 326 IAC 6-3 without any need or requirement for emissions reductions. As the equation used in 326 IAC 6-3-2 is nonlinear and becoming more stringent as the process weight rate increases while emissions increase in throughput, the application evaluated emissions at the maximum rated capacity of the lines. The only way that emissions could increase beyond the limits stated in Condition D.2.1 is if additional equipment is added or if a malfunction/deviation occurred. In both cases the emissions exceedance would be documented by means other than daily emissions monitoring. Sections B.13, B.16, B.17, and B.19 cover these conditions. This excessive monitoring requirement is burdensome and expensive without any additional level of environmental protection. Rieter Automotive requests that this condition be deleted in its entirety.

Response to Comment 15:

Upon further review, IDEM, OAM has determined that the emission units at the source are not subject to the requirements of 326 IAC 6-3-2 (Process Operations), rather, the emission units at the source should be subject to the requirements of 326 IAC 6-1-2(a) (Particulate Matter Emission Limitations). The allowable emission limitations are now considered to be below the applicability thresholds for compliance monitoring. Therefore, the compliance monitoring requirements for these emission units have been removed from the final permit.

Condition D.2.6 "Visible Emissions Notations" has been changed to be as follows:

D.2.6 ~~Visible Emissions Notations~~ Monitoring

- ~~(a) Daily visible emission notations of the Line 2 stack exhausts shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.~~
- ~~(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.~~
- ~~(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.~~
- ~~(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.~~
- ~~(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.~~

Monitoring of these facilities is not specifically required by this permit. However, any change or modification to these facilities as specified in 326 IAC 2-1, may require this facility to have monitoring requirements.

Comment 16:

Condition D.2.7(a)

As shown in comment #15 to Section D.2.6, the daily monitoring is not beneficial nor required. Likewise, the record keeping supporting it should not be required. Record keeping without any environmental benefit nor regulatory requirement is onerous and burdensome. Rieter Automotive requests that this condition be deleted in its entirety.

Response to Comment 16:

Upon further review, IDEM, OAM has determined that the emission units at the source are not subject to the requirements of 326 IAC 6-3-2 (Process Operations), rather, the emission units at the source should be subject to the requirements of 326 IAC 6-1-2(a) (Particulate Matter Emission Limitations). The allowable emission limitations are now considered to be below the applicability thresholds for compliance monitoring. Therefore, the record keeping requirements for compliance monitoring for these emission units have been removed from the final permit.

Condition D.2.7(a) "Record Keeping Requirements" has been deleted from the final permit as follows. The remaining sections of this condition have been renumbered:

~~———— (a) ——— To document compliance with Condition D.2.6, the Permittee shall maintain records of daily visible emission notations of the Line 2 stack exhaust.~~

Comment 17:

Condition D.2.7(b)

The requirement to document compliance with Conditions D.2.3 and D.4.2 (a pounds per gallon VOC content limit) on a monthly basis is onerous and burdensome and would provide no additional level of environmental protection because the VOC content must already be documented and submitted to IDEM for the Quarterly Compliance Monitoring Report (pursuant to Condition C.22). Quarterly record keeping to confirm compliance with the VOC content limit is sufficient and the more frequent recording on a monthly basis is unnecessary and nonbeneficial. Rieter Automotive requests that the record keeping requirement be revised to quarterly.

There are no VOC emission limits established in Conditions D.2.3 or D.4.2, therefore, the (b)(1) requirement to record the “amount” of each coating material and solvent used is not applicable and should be deleted. Similarly, data on cleanup solvents is not applicable to the demonstration of compliance with the VOC content limit of Conditions D.2.3 or D.4.2. Consequently, the first sentence of (b)(1) should be revised to provide:

The VOC content of each coating material and solvent *added to coatings* used.

The last sentence of (b)(1) and (c)(1) should be deleted from Conditions D.2.7 and D.4.10 because it is irrelevant for purposes of VOC content compliance to differentiate between the solvent usage amounts for coating materials and cleanup.

The general documentation requirements of (2) - (6) have been included to track VOC usage data for sources, unlike Rieter Automotive, which have monthly VOC emission limits. There are no such limits applicable to these facilities. The detail required in (2) - (6), (i.e., the dates of use, the volume weighted VOC content for each month, the cleanup solvent usage, the total VOC usage, and the weight of VOC's emitted for each month) would not improve the quality of compliance, but only add to the record keeping burden already associated with the draft Part 70 Operating Permit. Furthermore, this unnecessary and nonbeneficial detail does not enhance the process and is repetitive of the Annual Emission Statement reporting requirement. The record keeping requirements of (2) - (6) should be deleted in their entirety.

Response to Comment 17:

1. Since the source must show continuous compliance with the permit requirements, records must be kept at least monthly. If IDEM or U.S. EPA requested documentation of a facility's compliance and records were only kept quarterly, the source would have a difficult time proving their compliant status. The source needs to keep records of the amount of each coating material and solvent used to show compliance with 326 IAC 8-2-11 for coatings as applied to the coating applicator. The data on cleanup solvent usage needs to be kept to differentiate the amount of solvent added to the coatings and the total solvent used. It can be used as a backup to document that compliant coatings are delivered to the coating applicator. There will be no changes to this condition due to these comments.
2. Condition D.2.7(b) “Record Keeping Requirements” has been changed to be as follows:
 - (b) To document compliance with Condition D.2.3, the Permittee shall maintain records in accordance with (1) through ~~(6)~~**(5)** below. Records maintained for (1) through ~~(6)~~**(5)** shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.2.3.

- (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

When non-compliant coatings are used, the following records shall be kept:

- (2) A log of the dates of use;
- (3) The volume weighted VOC content of the coatings used for each ~~month~~ **day**;
- ~~(4) The cleanup solvent usage for each month;~~
- ~~(5)~~**(4)** The total VOC usage for each month; and
- ~~(6)~~**(5)** The weight of VOCs emitted for each compliance period.

3. Condition D.4.10(c) (now renumbered Condition D.4.7(a)) "Record Keeping Requirements" has been changed to be as follows:

~~(c)~~**(a)** To document compliance with Condition D.4.3, the Permittee shall maintain records in accordance with (1) through ~~(6)~~**(5)** below. Records maintained for (1) through ~~(6)~~**(5)** shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.4.3.

- (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

When non-compliant coatings are used, the following records shall be kept:

- (2) A log of the dates of use;
- (3) The volume weighted VOC content of the coatings used for each ~~month~~ **day**;
- ~~(4) The cleanup solvent usage for each month;~~
- ~~(5)~~**(4)** The total VOC usage for each month; and
- ~~(6)~~**(5)** The weight of VOCs emitted for each compliance period.

Comment 18:

Condition D.2.7(c)

This requirement should be deleted in its entirety due to the non-applicability of 326 IAC 6-1-10.1 and Condition D.2.2, as provided in Comment 11.

Response to Comment 18:

Upon further review, IDEM, OAM has determined that the emission units at the source are not subject to the requirements of 326 IAC 6-3-2 (Process Operations), rather, the emission units at the source should be subject to the requirements of 326 IAC 6-1-2(a) (Particulate Matter Emission Limitations). The allowable emission limitations are now considered to be below the applicability thresholds for compliance monitoring. Therefore, the record keeping requirements for compliance monitoring for these emission units have been removed from the final permit.

Condition D.2.7(c) "Record Keeping Requirements" has been deleted from the final permit as follows. The remaining subsections of this condition have been re-lettered:

~~———— (c) ——— To document compliance with Condition D.2.2, the Permittee shall maintain records of particulate matter (PM) emissions from the Line 2 saturator.~~

Comment 19:

Section D.3

The TSD states that 326 IAC 8-2-5 (Paper Coating Operations) is applicable to the Line 8 reverse roll coaters. There is not any condition limiting the VOC content of the coatings used at the three (3) reverse roll coaters in Lines 6 & 7, even though these coaters apply coatings to the surface of the same or similar substrates as the Line 8 roll coaters. Rieter Automotive believes that 326 IAC 8-2-5, with a limit of 2.9 pounds VOC per gallon of coating, excluding water, delivered to the coaters also applies to Lines 6 & 7 reverse roll coaters.

Response to Comment 19:

1. Condition D.3.3 "Volatile Organic Compounds" has been added to the final permit as follows. The remaining conditions of this section have been renumbered:

D.3.3 Volatile Organic Compounds [326 IAC 8-2-5]

Pursuant to 326 IAC 8-2-5 (Paper Coating Operations), no owner or operator of a facility engaged in the surface coating of paper may cause, allow or permit the discharge into the atmosphere of any volatile organic compounds in excess of 2.9 pounds of VOC per gallon of coating excluding water, delivered to the two (2) reverse rollcoaters.

2. Condition D.3.3 (now renumbered Condition D.3.4) "Testing Requirements" has been changed to be as follows:

D.3.34 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing ~~at any specific time~~ when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the Particulate Matter (PM) **and Volatile Organic Compound (VOC)** limits specified in Conditions D.3.1, **D.3.2 and D.3.3** shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

3. Condition D.3.8 (now renumbered Condition D.3.7) "Record Keeping Requirements" has been changed to be as follows:

D.3.87 Record Keeping Requirements

~~———— (a) ——— To document compliance with Condition D.3.5, the Permittee shall maintain records of daily visible emission notations of the bulk handling operations in Lines 6 & 7 stack exhaust.~~

~~———— (b) ——— To document compliance with Condition D.3.6, the Permittee shall maintain the following:-~~

~~———— (1) ——— Daily records of the following operational parameters during normal operation when venting to the atmosphere:-~~

~~———— (A) ——— Inlet and outlet differential static pressure; and~~

~~———— (B) ——— Cleaning cycle: frequency and differential pressure.~~

~~———— (2) ——— Documentation of all response steps implemented, per event.~~

- ~~_____ (3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.~~
- ~~_____ (4) Quality Assurance/Quality Control (QA/QC) procedures.~~
- ~~_____ (5) Operator standard operating procedures (SOP).~~
- ~~_____ (6) Manufacturer's specifications or its equivalent.~~
- ~~_____ (7) Equipment "troubleshooting" contingency plan.~~
- ~~_____ (8) Documentation of the dates vents are redirected.~~

(a) To document compliance with Condition D.3.3, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.3.3.

- (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;**

When non-compliant coatings are used, the following records shall be kept:

- (2) A log of the dates of use;**
- (3) The volume weighted VOC content of the coatings used for each day;**
- (4) The total VOC usage for each month; and**
- (5) The weight of VOCs emitted for each compliance period.**

(e)(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Comment 20:

Condition D.3.6

Condition D.3.5 adequately assures continuous compliance with Condition D.3.1 and 326 IAC 6-3-2(c). This Condition D.3.6 is redundant. Further, any relationship between baghouse pressure drop and mass emission rates is strictly guesswork. The relation between mass particulate emissions and opacity has long been accepted. What is the Permittee to do when Conditions D.3.5 and D.3.6 are in conflict? It is eminently possible that a baghouse could develop a high pressure drop, especially as it builds up an effective "cake" and there will be very little if any visible emissions. This requirement, in addition to being unnecessary, burdensome, and onerous, sets up a situation where the Permittee will be forced (by ill-considered permit conditions) to shut down this operation to perform maintenance operations that are simply not needed. Rieter Automotive requests that this condition be deleted in its entirety.

Response to Comment 20:

Upon further review, IDEM, OAM has determined that the emission units at the source are not subject to the requirements of 326 IAC 6-3-2 (Process Operations), rather, the emission units at the source should be subject to the requirements of 326 IAC 6-1-2(a) (Particulate Matter Emission Limitations). The allowable emission limitations are now considered to be below the applicability thresholds for compliance monitoring. Therefore, the compliance monitoring requirements for these emission units have been removed from the final permit.

1. Condition D.3.4 (now renumbered Condition D.3.5) "Particulate Matter" has been changed to be as follows:

D.3.45 Particulate Matter (PM)

Pursuant to 326 IAC ~~6-3-2 (Process Operations)~~ **6-1-2(a) (Particulate Emission Limitations)**, the twelve (12) baghouses for PM control shall be in operation at all times when the bulk handling operations in Lines 6 & 7 are in operation.

2. Condition D.3.5 "Visible Emission Notations" has been deleted from the final permit as follows. The remaining conditions of this section have been renumbered:

~~D.3.5 Visible Emissions Notations~~

- ~~(a) Daily visible emission notations of the bulk handling operations in Lines 6 & 7 stack exhausts shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.~~
- ~~(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.~~
- ~~(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.~~
- ~~(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.~~
- ~~(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.~~

3. Condition D.3.6 "Parametric Monitoring" has been deleted from the final permit as follows. The remaining conditions of this section have been renumbered:

~~D.3.6 Parametric Monitoring~~

- ~~The Permittee shall record the total static pressure drop across the baghouses used in conjunction with the bulk handling operations in Lines 6 & 7, at least once daily when the bulk handling operations in Lines 6 & 7 are in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouses shall be maintained within the range of 2.0 and 6.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.~~
- ~~The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.~~

4. Condition D.3.7 "Broken Bag or Failure Detection" has been deleted from the final permit as follows. The remaining conditions of this section have been renumbered:

~~D.3.7 Broken Bag or Failure Detection~~

- ~~In the event that bag failure has been observed:~~
- ~~(a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced.~~
- ~~(b) Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion.~~

5. Condition D.3.6 "Monitoring" has been added to the final permit as follows. The remaining conditions of this section have been renumbered:

D.3.6 Monitoring

Monitoring of these facilities is not required by this permit. However, any change or modification to these facilities, as specified in 326 IAC 2-1 may require these facilities to have monitoring requirements.

Comment 21:

Condition D.3.8(b)

As shown in comment #20 to Condition D.3.6, imposition of daily monitoring of baghouse pressure drops is unnecessary and burdensome. Likewise, record keeping that supports this condition is equally invalid. Rieter Automotive requests that this condition be deleted in its entirety.

Response to Comment 21:

Upon further review, IDEM, OAM has determined that the emission units at the source are not subject to the requirements of 326 IAC 6-3-2 (Process Operations), rather, the emission units at the source should be subject to the requirements of 326 IAC 6-1-2(a) (Particulate Matter Emission Limitations). The allowable emission limitations are now considered to be below the applicability thresholds for compliance monitoring. Therefore, the compliance monitoring requirements for these emission units have been removed from the final permit.

Condition D.3.8 (now renumbered Condition D.3.7) "Record Keeping Requirements" has been changed to be as follows:

D.3.87 Record Keeping Requirements

- ~~(a) To document compliance with Condition D.3.5, the Permittee shall maintain records of daily visible emission notations of the bulk handling operations in Lines 6 & 7 stack exhaust.~~
- ~~(b) To document compliance with Condition D.3.6, the Permittee shall maintain the following:~~
- ~~(1) Daily records of the following operational parameters during normal operation when venting to the atmosphere:~~
- ~~(A) Inlet and outlet differential static pressure; and~~

- ~~_____ (B) Cleaning cycle: frequency and differential pressure.~~
- ~~_____ (2) Documentation of all response steps implemented, per event.~~
- ~~_____ (3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.~~
- ~~_____ (4) Quality Assurance/Quality Control (QA/QC) procedures.~~
- ~~_____ (5) Operator standard operating procedures (SOP).~~
- ~~_____ (6) Manufacturer's specifications or its equivalent.~~
- ~~_____ (7) Equipment "troubleshooting" contingency plan.~~
- ~~_____ (8) Documentation of the dates vents are redirected.~~

- (a) To document compliance with Condition D.3.3, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.3.3.**

- (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;**

When non-compliant coatings are used, the following records shall be kept:

- (2) A log of the dates of use;**
- (3) The volume weighted VOC content of the coatings used for each day;**
- (4) The total VOC usage for each month; and**
- (5) The weight of VOCs emitted for each compliance period.**

- ~~(d)~~(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.**

Comment 22:

Conditions D.3.8(b)(1)(B), D.4.10(b)(1)(B), and D.5.13(b)(1)(B)

Cleaning cycle frequency and differential pressure are irrelevant to the mass emission rate penetrating a filter media. This condition should be dropped throughout the permit even if the parametric monitoring it supports is retained in this permit.

Response to Comment 22:

Condition D.3.8(b), D.4.10(b) and D.5.13(b) have been deleted from the final permit.

Comment 23:

Conditions D.3.8(b)(4), D.4.10(b)(4), D.5.13(b)(4)

Quality Assurance and Quality Control procedures are not even defined anywhere in the permit or the rules. These words have a very different meaning in the industrial world than in the regulatory world. It is recommended that this condition be deleted or clarified even if the parametric monitoring it supports is retained in this permit.

Response to Comment 23:

Condition D.3.8(b), D.4.10(b) and D.5.13(b) have been deleted from the final permit.

Comment 24:

Condition D.4.8

Condition D.4.7 adequately assures continuous compliance with Condition D.4.1 and 326 IAC 6-3-2(c). This Condition D.4.8 is redundant. Further, any relationship between baghouse pressure drop and mass emission rates is strictly guesswork. The relation between mass particulate emissions and opacity has been long accepted. What is the Permittee to do when a Conditions D.4.7 and Condition D.4.8 are in conflict? It is eminently possible that a baghouse could develop a high pressure drop, especially as it builds up an effective "cake" and there will be very little if any visible emissions. This requirement, in addition to being unnecessary, burdensome, and onerous, sets up a situation where the Permittee will be forced (by ill-considered permit conditions) to shut down this operation to perform maintenance operations that simply are not needed. Rieter Automotive requests that this condition be deleted in its entirety.

Response to Comment 24:

Upon further review, IDEM, OAM has determined that the emission units at the source are not subject to the requirements of 326 IAC 6-3-2 (Process Operations), rather, the emission units at the source should be subject to the requirements of 326 IAC 6-1-2(a) (Particulate Matter Emission Limitations). The allowable emission limitations are now considered to be below the applicability thresholds for compliance monitoring. Therefore, the compliance monitoring requirements for these emission units have been removed from the final permit.

1. Condition D.4.6 "Particulate Matter" has been deleted from the final permit as follows. The remaining conditions of this section have been renumbered:

D.4.6 Particulate Matter (PM)

Pursuant to 326 IAC 6-3-2 **6-1-2(a) (Particulate Emission Limitations)**, the thirteen (13) baghouses for PM control shall be in operation at all times when the granular material handling operations in Line 8 are in operation.

2. Condition D.4.7 "Visible Emissions Notations" has been deleted from the final permit as follows. The remaining conditions of this section have been renumbered:

~~D.4.7 Visible Emissions Notations~~

-
- ~~(a) Daily visible emission notations of the granular material handling operations in Line 8 stack exhausts shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.~~
- ~~(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.~~

- ~~———— (c) ——— In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. —~~
- ~~———— (d) ——— A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. —~~
- ~~———— (e) ——— The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. —~~

3. Condition D.4.8 "Parametric Monitoring" has been deleted from the final permit as follows. The remaining conditions of this section have been renumbered:

~~D.4.8 Parametric Monitoring~~

- ~~———— The Permittee shall record the total static pressure drop across the baghouses used in conjunction with the granular material handling operations in Line 8, at least once daily when the granular material handling operations in Line 8 is in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouses shall be maintained within the range of 2.0 and 6.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading. —~~

- ~~———— The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months. —~~

4. Condition D.4.9 "Broken Bag or Failure Detection" has been deleted from the final permit as follows. The remaining conditions of this section have been renumbered:

~~D.4.9 Broken Bag or Failure Detection~~

- ~~———— In the event that bag failure has been observed:~~
- ~~———— (a) ——— The affected compartments will be shut down immediately until the failed units have been repaired or replaced. For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. —~~
- ~~———— (b) ——— Immediately upon the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. —~~

5. Condition D.4.7 "Monitoring" has been added to the final permit as follows. The remaining conditions of this section have been renumbered:

D.4.7 Monitoring

Monitoring of these facilities is not required by this permit. However, any change or modification to these facilities, as specified in 326 IAC 2-1 may require these facilities to have monitoring requirements.

Comment 25:

Condition D.4.10(b)

As shown in Comment #24 to Condition D.4.8, imposition of daily monitoring of baghouse pressure drops is unnecessary and burdensome. Likewise, record keeping that supports this condition is equally invalid. Rieter Automotive requests that this condition be deleted in its entirety.

Response to Comment 25:

Upon further review, IDEM, OAM has determined that the emission units at the source are not subject to the requirements of 326 IAC 6-3-2 (Process Operations), rather, the emission units at the source should be subject to the requirements of 326 IAC 6-1-2(a) (Particulate Matter Emission Limitations). The allowable emission limitations are now considered to be below the applicability thresholds for compliance monitoring. Therefore, the record keeping requirements for compliance monitoring for these emission units have been removed from the final permit.

Condition D.4.10 (now renumbered Condition D.4.8) "Record Keeping Requirements" has been changed to be as follows:

D.4.10 Record Keeping Requirements

-
- ~~(a) To document compliance with Condition D.4.7, the Permittee shall maintain records of daily visible emission notations of the granular material handling operations in Line 8 stack exhaust.~~
- ~~(b) To document compliance with Condition D.4.8, the Permittee shall maintain the following:~~
- ~~(1) Daily records of the following operational parameters during normal operation when venting to the atmosphere:~~
- ~~(A) Inlet and outlet differential static pressure; and~~
- ~~(B) Cleaning cycle: frequency and differential pressure.~~
- ~~(2) Documentation of all response steps implemented, per event.~~
- ~~(3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.~~
- ~~(4) Quality Assurance/Quality Control (QA/QC) procedures.~~
- ~~(5) Operator standard operating procedures (SOP).~~
- ~~(6) Manufacturer's specifications or its equivalent.~~
- ~~(7) Equipment "troubleshooting" contingency plan.~~
- ~~(8) Documentation of the dates vents are redirected.~~
- (e)(a)** To document compliance with Condition D.4.3, the Permittee shall maintain records in accordance with (1) through ~~(6)~~**(5)** below. Records maintained for (1) through ~~(6)~~**(5)** shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.4.3.

- (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

When non-compliant coatings are used, the following records shall be kept:

- (2) A log of the dates of use;
 - (3) The volume weighted VOC content of the coatings used for each month day;
 - ~~(4) The cleanup solvent usage for each month;~~
 - ~~(5)~~(4) The total VOC usage for each month; and
 - ~~(6)~~(5) The weight of VOCs emitted for each compliance period.
- ~~(d)~~(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Comment 26:

Condition D.5.1(a) & (b)

On page 27 of the TSD, item (e) indicated that 326 IAC 8-1-6 was not applicable because 326 IAC 8-7 applies for the Line 92 NAVA oven. Since 326 IAC 8-7 also applies to the Line 91 oven, 326 IAC 8-1-6 is not applicable to Line 91. Therefore, Rieter Automotive requests that Condition D.5.1(a) and (b) be deleted. The listed applicable construction permit CP 089-6837-00013 was actually requested to be voided on 1-9-98. Consequently, the applicable permits for the Line 92 NAVA Oven are the previously issued registration and operating permit. Notwithstanding the above request to delete this condition, Rieter Automotive requests D.5.1(a) be changed as follows:

Pursuant to Registration (089-4719-00013) issued September 26, 1995 for the NAVA Oven and Operation Permit (OP 45-05-91-0460) issued NOVEMBER 30, 1987, the Volatile Organic Compound (VOC) emissions from Line 92 shall be limited to ten (10) pounds per hour and forty-three (43) tons per year.

Response to Comment 26:

Condition D.5.1 "Volatile Organic Compound" has been changed to be as follows:

D.5.1 Volatile Organic Compound (VOC) ~~[326 IAC 8-1-6]~~ [326 IAC 8-7]

- (a) Pursuant to ~~326 IAC 8-1-6 (General Reduction Requirements)~~ and Construction Permit (CP 089-6837-00013), issued on December 23, 1996, **The input of Volatile Organic Compound (VOC) to the Line 92 and the usage of cleanup solvent for the Line 92 (the usage of cleanup solvent may need to take into account any recycling of cleanup rags or reused solvent) shall be limited such that the Volatile Organic Compound (VOC) emissions from the Line 92 and Line 92 NAVA Oven shall not exceed forty-three (43) tons per year when using the thermal oxidizer with 81% overall control efficiency or the overall control efficiency determined in the stack test, whichever is lower. This overall control efficiency and input VOC limitation shall be considered RACT. the volatile organic compound (VOC) input into the NAVA Oven shall be limited to 18.38 pounds per hour. This input VOC limitation is shall be** based on the following equation:

$$VOC_{input} = VOC_{limit} / [1 - (Capture Efficiency)(Destruction Efficiency)]$$

- (b) Pursuant to Exemption (CP-089-9217-00013), issued May 22, 1998, the Volatile Organic Compound (VOC) emissions from the Line 91 shall be limited to ten (10) pounds per hour and forty-three (43) tons per year. **The input of Volatile Organic Compound (VOC) to the Line 91 and the usage of cleanup solvent for the Line 91 (the usage of cleanup solvent may need to take into account any recycling of cleanup rags or reused solvent) shall be limited such that the Volatile Organic Compound (VOC) emissions from the Line 91 shall not exceed forty-three (43) tons per year when using the thermal oxidizer with an 81% overall control efficiency or overall control efficiency to be determined in the stack test, whichever is lower. This overall control efficiency and input VOC limitation shall be considered RACT. The input VOC limit shall be based on the following equation:**

$$\text{VOC}_{\text{input}} = \text{VOC}_{\text{limit}} / [1 - (\text{Capture Efficiency})(\text{Destruction Efficiency})]$$

Comment 27:

Condition D.5.3

The word "Laminations" needs to be corrected to "Limitations".

Response to Comment 27:

Condition D.5.3 (now renumbered Condition D.5.2) "Particulate Matter" has been changed to be as follows:

D.5.32 Particulate Matter (PM) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Emission ~~Laminations~~ **Limitations** for Facilities specified in 326 IAC 6-2-1(c)), the **particulate matter emissions from the one (1) 11.2 mmBtu/hr natural gas fired Line 92 boiler is limited to 0.50 0.40 pounds per million British thermal units per hour (lb/mmBtu).** This limitation is based on the following equation:

$$Pt = 1.09 / Q^{0.26}$$

Where:

Pt = Pounds of particulate matter emitted per million Btu heat input (lb/mmBtu).

Q = Total source maximum operating capacity rating in million Btu per hour (mmBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's operation permit application, except when some lower capacity is contained in the facility's operation permit; in which case the capacity specified in the operation permit shall be used.

Comment 28:

Condition D.5.4

Both PM emission limits are stated to apply to Line 92. Please correct the condition to refer appropriately to Lines 91 and 92.

Response to Comment 28:

Condition D.5.4 (now renumbered Condition D.5.3) "Particulate Matter" has been changed to be as follows:

D.5.43 Particulate Matter (PM) [326 IAC 6-3-2] [326 IAC 6-1-2(a)]

Pursuant to 326 IAC 6-3-2 (Process Operations) **6-1-2(a) (Particulate Emissions Limitations)**, the PM from the **Line 91, Line 92, fiber prep and resin recycle** shall not exceed **5.74 pounds per hour** and the PM from Line 92 shall not exceed **6.32 pounds per hour** as established as E in the following formula: **0.03 grains per dry standard cubic foot. See the following table for the equivalent pound per hour emissions:**

Emission Units/Stack	Flow Rate (acfm)	326 IAC 6-1-2(a) limitation (gr/dscf)	Equivalent limit in pounds per hour
Line 91 / FCU-2	6,000	0.03	1.54
Line 92 / FCU-4	16,704	0.03	4.29

~~Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:~~

~~$$E = 4.10 P^{0.67}$$
 where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour~~

Comment 29:

Condition D.5.5

The appropriate VOC test method for the Lines 91 and 92 thermal oxidizers is Method 25A and/or Method 25 as appropriate to the p.p.m. measured. Rieter Automotive requests that this revision be made.

Response to Comment 29:

Condition D.5.5 "Testing Requirements" has been changed to be as follows:

D.5.5 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

Within 60 days after achieving maximum production rate the Permittee shall perform VOC testing on the Line 91 thermal oxidizer and during the period between 30 and 36 months after issuance of this permit, the Permittee shall perform VOC testing on the Line 92 thermal oxidizer utilizing **Method 25A and/or Method 25** or other methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. In addition to those requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

Comment 30:

Condition D.5.6

D.5.1 contains no VOC content or usage limits. There are no liquid coatings that are used on Lines 91 or 92. There is a resin which is a solid and Method 24 would not be applicable. Rieter Automotive requests that this condition be removed in its entirety.

Response to Comment 30:

The VOC content of the resin must be determined in order to calculate the usage. IDEM, OAM requires the source to maintain documentation of the VOC content of any coating or resin used to document compliance with 326 IAC 8-2-11. Material Safety Data Sheets (MSDS) would be a sufficient form of documentation. If IDEM, OAM wants to determine the VOC content of a coating or resin, either Method 24 or some other applicable method would be used. Condition D.5.6 "Volatile Organic Compounds" has been changed to be as follows:

D.5.6 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Condition D.5.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating **or resin** manufacturer. IDEM, OAM reserves the authority to determine compliance using Method 24 **or other IDEM, OAM approved method** in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Comment 31:

Condition D.5.7 and D.5.13(d)

A daily demonstration of compliance with Conditions D.5.1, is an unfounded and burdensome extrapolation from the General Reduction Requirements of 326 IAC 8-1-6. Page 27 of the TSD specifically states that the potential VOC emissions from the ovens are well below the limit. Furthermore, Condition D.5.2 (Specific VOC Reduction Requirements for Lake, Porter, Clark and Floyd Counties) and Condition D.5.5 (thermal oxidizer VOC testing) already ensure full compliance to the highest degree of certainty with Condition D.5.1. Rieter Automotive must already perform these VOC usage and emission calculations on a quarterly and annual basis for the Quarterly Compliance Monitoring Report and the Annual Emission Statement, respectively. Because a daily compliance demonstration has not been imposed upon all sources applicable to 326 IAC 8-1-6, the imposition of a daily calculations of the VOC usage and emissions from Lines 91 and 92 has no basis in rule, is discriminatory to Rieter Automotive on its face, and is overreaching IDEM's authority. Rieter Automotive requests that these Conditions D.5.7 and D.5.13(d) be deleted in their entirety.

Response to Comment 31:

1. Condition D.5.7 "VOC Emissions" has been changed to be as follows:

D.5.7 VOC Emissions

Compliance with Condition D.5.1 shall be demonstrated **at within 30 days of** the end of each ~~day~~ **month** based on the total volatile organic compound usage for the most recent ~~365-day~~ **12 consecutive month** period.

2. Condition D.5.13(d) (now renumbered Condition D.5.9(b)) "Record Keeping Requirements" has been changed to be as follows:

~~(d)~~**(b)** To document compliance with Condition D.5.1, the Permittee shall keep ~~daily~~ **monthly** records of input volatile organic compound (VOC) for the Line 92 NAVA oven and the Line 91 conventional oven.

Comment 32:

Condition D.5.10

Condition D.5.9 adequately assures continuous compliance with Conditions D.5.4 and 326 IAC 6-3-2(c). This condition is redundant. Further, any relationship between baghouse pressure drop and mass emission rates is strictly guesswork. The relation between mass particle emissions and opacity has long been accepted. What is the Permittee to do when Conditions D.5.9 and D.5.10 are in conflict? It is eminently possible that a baghouse could develop a high pressure drop, especially as it builds up and effective "cake" and there will be very little if any visible emissions. This requirement, in addition to being unnecessary, burdensome, and onerous, sets up a situation where the Permittee will be forced (by ill-considered permit conditions) to shut down this operation to perform maintenance operations that simply are not needed. Rieter Automotive requests that this condition be deleted in its entirety.

Response to Comment 32:

Upon further review, IDEM, OAM has determined that the emission units at the source are not subject to the requirements of 326 IAC 6-3-2 (Process Operations), rather, the emission units at the source should be subject to the requirements of 326 IAC 6-1-2(a) (Particulate Matter Emission Limitations). The allowable emission limitations are now considered to be below the applicability thresholds for compliance monitoring. Therefore, the compliance monitoring requirements for these emission units have been removed from the final permit.

1. Condition D.5.9 "Visible Emissions Notations" has been deleted from the final permit as follows. The remaining conditions of this section have been renumbered:

~~D.5.9 Visible Emissions Notations~~

- ~~(a) Daily visible emission notations of the Line 91 and Line 92 stack exhausts shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.~~
- ~~(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.~~
- ~~(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.~~
- ~~(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.~~
- ~~(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.~~

2. Condition D.5.10 "Parametric Monitoring" has been deleted from the final permit as follows. The remaining conditions of this section have been renumbered:

D.5.10 Parametric Monitoring

~~The Permittee shall record the total static pressure drop across the baghouses used in conjunction with the Line 91 and Line 92, at least once daily when the Line 91 and Line 92 is in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouses shall be maintained within the range of 0.5 to 10.0 inches of water for the Line 91 and Line 92 Fiber Prep/Process BH, 0.5 to 7.0 inches of water for the Line 91 and Line 92 Fiber Prep/Final BH, and 0.1 to 3.0 inches of water for the Line 91 and Line 92 Resin Recycle or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.~~

~~The instrument used for determining the pressure shall comply with Section C Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.~~

3. Condition D.5.11 "Broken Bag or Failure Detection" has been deleted from the final permit as follows. The remaining conditions of this section have been renumbered:

D.5.11 Broken Bag or Failure Detection

~~In the event that bag failure has been observed:~~

- ~~(a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced.~~
- ~~(b) Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion.~~

4. Condition D.5.8 "Particulate Matter" has been added to the final permit as follows. The remaining conditions of this section have been renumbered:

D.5.8 Particulate Matter (PM)

Pursuant to 326 IAC 6-1-2(a) (Particulate Emissions Limitations), the three (3) baghouses for PM control on Line 91 and three (3) baghouses on Line 92 shall be in operation at all times when the Lines are in operation.

Comment 33:

Condition D.5.12(b)

326 IAC 8-7-3(2) establishes the applicable emission reduction requirement for the Line 92 thermal oxidizer as an overall control efficiency of 81%, not "a minimum 96% capture efficiency and 85.47% destruction efficiency." Please correct the emission reduction statement contained in this section to "an overall control efficiency of 81%." The wording of Condition D.5.12 is inconsistent with Condition D.5.1 (a) and (b).

Response to Comment 33:

Condition D.5.12 (now renumbered Condition D.5.9) "Thermal Incinerator" has been changed to be as follows:

D.5.12 9 Thermal Incinerator [326 IAC 8-7]

- (a) Pursuant to 326 IAC 8-7 (VOC Reduction Requirements for Lake County), the one (1) 15 million British thermal units per hour (mmBtu/hr) natural gas fired thermal incinerator for the Line 91 conventional oven shall be in operation at all times when the Line 91 conventional oven is in operation. When operating, the thermal incinerator shall maintain a minimum operating temperature of 1,400°F, ~~or unless a lower temperature is determined in the compliance test provided for in Section D.5.1 (b) to maintain an 81% minimum overall control efficiency or as determined in the stack test of potential Volatile Organic Compound (VOC) emissions.~~ The temperature of the thermal oxidizer at the point of oxidation shall be continuously monitored and recorded whenever any of the facilities are in operation.
- (b) Pursuant to 326 IAC 8-7 (VOC Reduction Requirements for Lake County), the one (1) 17.85 million British thermal units per hour (mmBtu/hr) natural gas fired thermal incinerator for the NAVA oven shall be in operation at all times when NAVA oven is in operation. When operating, the thermal incinerator shall maintain a minimum operating temperature of 1,400°F, ~~or unless a lower temperature is determined in the compliance test provided for in Section D.5.1 (a) to maintain an 81% minimum overall control efficiency or as determined in the stack test of potential Volatile Organic Compound (VOC) emissions.~~ The temperature of the thermal oxidizer at the point of oxidation shall be continuously monitored and recorded whenever any of the facilities are in operation.

Comment 34:

Condition D.5.13(b)

As shown in Comment #32 to Condition D.5.10, imposition of daily monitoring of baghouse pressure drops is unnecessary and burdensome. Likewise, record keeping that supports this condition is equally invalid. Rieter Automotive requests that this condition be deleted in its entirety.

Response to Comment 34:

Upon further review, IDEM, OAM has determined that the emission units at the source are not subject to the requirements of 326 IAC 6-3-2 (Process Operations), rather, the emission units at the source should be subject to the requirements of 326 IAC 6-1-2(a) (Particulate Matter Emission Limitations). The allowable emission limitations are now considered to be below the applicability thresholds for compliance monitoring. Therefore, the compliance monitoring requirements for these emission units have been removed from the final permit.

Condition D.5.13 (now renumbered Condition D.5.10) "Record Keeping Requirements" has been changed to be as follows:

D.5.1310 Record Keeping Requirements

- ~~(a) To document compliance with Condition D.5.9, the Permittee shall maintain records of daily visible emission notations of the Line 91 and Line 92 stack exhaust.~~
- ~~(b) To document compliance with Condition D.5.10, the Permittee shall maintain the following:~~
- ~~(1) Daily records of the following operational parameters during normal operation when venting to the atmosphere:-~~
- ~~(A) Inlet and outlet differential static pressure; and~~
- ~~(B) Cleaning cycle: frequency and differential pressure.~~
- ~~(2) Documentation of all response steps implemented, per event.~~

- ~~_____ (3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.~~
- ~~_____ (4) Quality Assurance/Quality Control (QA/QC) procedures.~~
- ~~_____ (5) Operator standard operating procedures (SOP).~~
- ~~_____ (6) Manufacturer's specifications or its equivalent.~~
- ~~_____ (7) Equipment "troubleshooting" contingency plan.~~
- ~~_____ (8) Documentation of the dates vents are redirected.~~

- ~~(e)~~(a) To document compliance with Condition D.5.9, the Permittee shall keep records of thermal incinerator temperatures from the 15 million British thermal units per hour (mmBtu/hr) Line 91 natural gas fired incinerator and the 17.85 million British thermal units per hour natural gas fired Line 92 Incinerator.
- ~~(d)~~(b) To document compliance with Condition D.5.1, the Permittee shall keep ~~daily~~ **monthly** records of input volatile organic compound (VOC) for the Line 92 NAVA oven and the Line 91 conventional oven.
- ~~(e)~~(c) Pursuant to 40 CFR 60.48c, the permittee shall submit notification of the date of construction, anticipated startup, and actual startup, as provided by § 60.7 of this part for the one (1) 11.2 million British thermal units per hour natural gas fired boiler in Line 92. This notification shall include:
 - (1) The design heat input capacity of the affected facility and identification of fuels to be combusted in the affected facility.
 - (2) If applicable, a copy of any Federally enforceable requirement that limits the annual capacity factor for any fuel or mixture of fuels under § 60.42c, or § 60.43c.
 - (3) The annual capacity factor at which the owner or operator anticipates operating the affected facility based on all fuels fired and based on each individual fuel fired.
- ~~(f)~~(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Comment 35:

Condition D.5.14

This certification report serves to notify IDEM on an annual basis of alternative fuels burned. However, natural gas is the only fuel used in the 11.2 mmBtu/hr boiler; there are no alternative fuels used. Therefore, this certification serves no purpose, other than an added reporting burden. Rieter Automotive requests this condition be deleted in its entirety.

Response to Comment 35:

Even though alternative fuel capability is not currently present with this boiler, the certification is required to show compliance with Condition D.5.1 "Particulate Matter" and 326 IAC 6-2-3. This certification also takes the place of having to perform daily visible emissions notations. The Office of Air Management would also have to give prior approval to use of any other types of fuels for this boiler. Natural Gas usage is not required to be reported on the Natural Gas Fired Boiler Certification. There will be no changes to this condition in the final permit due to this comment.

Comment 36:

Condition D.6.3, D.7.4 and D.8.3

In the event of a change or modification to the liquid organic storage tank area, fire pump, or boiler identified as FCU-5, it is not conclusive that monitoring requirements would become applicable. IDEM is overreaching its authority. Therefore, the second sentence of Conditions D.6.3, D.7.4 and D.8.3 should be reworded as follows:

However, ~~a any~~ change or modification to this facility as specified in 326 IAC 2-1, ~~would~~ **could** require this facility to have monitoring requirements.

Response to Comment 36:

1. Condition D.6.3 "Monitoring Requirements" has been changed to be as follows:

D.6.3 Monitoring Requirements

Monitoring of this facility is not required by this permit. However, any change or modification to this facility as specified in 326 IAC 2-1 ~~would~~ **may** require this facility to have monitoring requirements.

2. Condition D.8.3 (now renumbered Condition D.7.3) "Monitoring" has been changed to be as follows:

D.87.3 Monitoring

Monitoring of this facility is not required by this permit. However, any change or modification to this facility as specified in 326 IAC 2-1 ~~would~~ **may** require this facility to have monitoring requirements.

Comment 37:

Section D.7

Condition D.7.1 limits fuel usage to avoid 326 IAC 2-3 Emission Offset. Condition D.7.5 and Condition D.7.6 require record keeping and a quarterly report of fuel usage. According to guidance for federal operating permits, such emergency equipment may be considered to operate for a maximum of 500 hours per year when calculating potential to emit. This maximum would equate to:

$$(550 \text{ hr/yr}) * (\text{yr}/12 \text{ months}) * (208 \text{ hp}) * (0.30 \text{ lb/hp-hr}) * (1 \text{ gal}/7 \text{ lb}) = 371.4 \text{ gal/month}$$

As 371.4 gal/month < 1,199 gal month, simply operating within federal guidelines for operation of emergency equipment would comply with D.7.1.

Even if a fire broke out on the last day of the month, the pump could be operated for nearly 113 hours and still comply with the operating condition. In 113 hours, the fire would be extinguished or the plant would have burned to the ground. Therefore, consumption of more than 1,199 gallons per month is a far-fetched possibility.

Compliance with D.7.6 will be an operational nuisance for the company and just one more report for regulatory personnel to evaluate and file. As the fire pumps constitute and insignificant activity pursuant to 326 IAC 2-7-1(20)(D)(xxii)(CC) and 326 IAC 2-7-1(20)(D)(iii)(AA), there is no environmental benefit to making quarterly reports. Further the fuel usage will be already included in the Annual Emission Statement.

Rieter Automotive requests that Section D.7 be deleted in its entirety and that both the (1) 200 horsepower primary fire pump, fueled by #1 diesel fuel and one (1) 285 gallon fuel tank, and the one (1) 110 Emergency horsepower fire pump, fueled by #1 diesel fuel and one (1) 275 gallon fuel tank be designated as insignificant activities.

Response to Comment 37:

IDEM, OAM agrees that this equipment should be considered insignificant. Therefore, there are no requirements for these facilities. Section D.7 "FACILITY OPERATION CONDITIONS" has been deleted from the final permit as follows. The remaining sections of this permit have been renumbered:

~~SECTION D.7 FACILITY OPERATION CONDITIONS~~

~~Facility Description [326 IAC 2-7-5(15)]-~~
~~(11) One (1) 200-horsepower fire pump, fueled by #1 diesel fuel and one (1) 285-gallon fuel tank.~~

~~Emission Limitations and Standards [326 IAC 2-7-5(1)]~~

~~D.7.1 Fuel Usage Limitation~~

~~Pursuant to Construction Permit (CP 089 5604 00013), issued July 30, 1996, the use of #1 diesel fuel shall be limited to 1,199 gallons per month. This limitation is equivalent to NO_x and VOC emissions of 12.0 tons per year and 1.0 ton per year, respectively, from the fire pump. This will make the requirements of 326 IAC 2-3 (Emission Offset) not applicable.~~

~~D.7.2 Sulfur Dioxide (SO₂) [326 IAC 7-1.1]~~

~~Any change or modification to the one (1) 200-horsepower fire pump, must be approved by the Office of Air Management (OAM) before such change or modification can occur.~~

~~Compliance Determination Requirements~~

~~D.7.3 Testing Requirements [326 IAC 2-7-6(1), (6)]~~

~~The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the Volatile Organic Compound (VOC) and Oxides of Nitrogen (NO_x) limit specified in Condition D.7.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.~~

~~Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]~~

~~D.7.4 Monitoring~~

~~Monitoring of this facility is not required by this permit. However, any change or modification to this facility as specified in 326 IAC 2-1 would require this facility to have monitoring requirements.~~

~~Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]~~

~~D.7.5 Record Keeping Requirements~~

~~To document compliance with Condition D.7.1, the Permittee shall keep records of monthly fuel usage.~~

~~D.7.6 Reporting Requirements~~

~~A quarterly summary of the information to document compliance with Condition D.7.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.~~

Comment 38:

Condition D.7.2

Notwithstanding Comment #37, in the event of a change or modification to the fire pump, it is not conclusive that approval by the OAM would be required. Only a change or modification which would increase the potential sulfur dioxide emissions to 25 tons per year or more would trigger the requirements of 326 IAC 7-1.1. Rieter Automotive requests that Condition D.7.2 be corrected as noted.

Response to Comment 38:

Section D.7 "FACILITY OPERATION CONDITIONS" has been deleted from the final permit. Therefore, this condition is no longer applicable to these facilities.

Comment 39:

TSD, The source name needs to be corrected to Rieter Automotive North America, Inc. under "Source Name" and in the first paragraph.

Response to Comment 39:

IDEM, OAM agrees that this change should be made. The Technical Support Document (TSD) should also reflect these changes. However, the TSD is not physically changed after public notice. The changes are noted here in the Addendum to the Technical Support Document.

Comment 40:

TSD, Existing Approvals

- (1) Exemption (no number), issued April 3, 1981 - Department 44.
- Insert: (2) Operation Permit (OP 05-91-0460), issued November 30, 1987 - old plant permit. Previous Permit (OP 45-12-85-0373), issued February 15, 1982.
- (3) Registration (no number), issued July 24, 1985 - Line 92 incinerator.
- (4) Exemption (CP 089-4282), issued January 1, 1995 - Line 92 Fiber blending equipment.
- (5) Exemption (CP 089-4301), issued February 17, 1995 - C-J Line.
- (6) Registration (CP 089-4461), issued May 23, 1995, Amended (A089-4642) on August 28, 1995. - Line 8
- (7) Exemption (CP 089-4718), issued August 23, 1995 - 110 HP emergency fire pump standby.
- (8) Registration (CP 089-4774), issued November 6, 1995 - Foam Part Line.
- (9) Registration (CP 089-4720), issued November 6, 1996 - Line 2.
- (10) Construction Permit (CP 089-5604), issued July 30, 1996, Amended (A089-7997) on February 10, 1997 - 200 HP Primary Fire Pump.
- Delete: (11) Construction Permit (CP 089-6837), issued on December 23, 1996. Line 92 upgrade. Requested to have this voided on January 9, 1998.

- (12) Registration (CP 089-8167), issued on May 5, 1997 - Line 6 upgrade with increase in production.
- (13) Exemption (CP 089-8353), issued July 8, 1997 - Foam part cell injection molding.
- (14) Exemption (CP 089-9127), issued on May 22, 1998 - Line 91 Oven rebuild & thermal oxidizer.

Insert: (15) Registration (CP 089-4719), issued September 26, 1995 - Line 92 NAVA oven and boiler.

Insert: (16) Registration (CP 089-4717), issued December 1, 1995 - Line 6 & 7 original registration.

Response to Comment 40:

IDEM, OAM agrees that this change should be made. The Technical Support Document (TSD) should also reflect these changes. However, the TSD is not physically changed after public notice. The changes are noted here in the Addendum to the Technical Support Document.

Comment 41:

TSD, Air Pollution Control Justification as Integral Part of the Process

Rieter Automotive requests that the twelve (12) baghouses from the raw material handling in Lines 6 & 7 be added to the Justification. The material handling in Lines 6 & 7 is the same as Line 8.

Response to Comment 41:

IDEM, OAM agrees that this change should be made. The Technical Support Document (TSD) should also reflect these changes. However, the TSD is not physically changed after public notice. The changes are noted here in the Addendum to the Technical Support Document.

Comment 42:

TSD, Page 16, Padding Line 92

In the first paragraph, third sentence, after.....the manufacturing of semi-cured batts, add: "creates less smoke that the production of fully cured batts."

Response to Comment 42:

IDEM, OAM agrees that this change should be made. The Technical Support Document (TSD) should also reflect these changes. However, the TSD is not physically changed after public notice. The changes are noted here in the Addendum to the Technical Support Document.

Comment 43:

TSD, Page 18, Line 93 NAVA Curing Oven

The maximum annual throughput needs to be corrected to 28,732,000 lbs/yr.

Response to Comment 43:

IDEM, OAM agrees that this change should be made. The Technical Support Document (TSD) should also reflect these changes. However, the TSD is not physically changed after public notice. The changes are noted here in the Addendum to the Technical Support Document.

Comment 44:

TSD, Page 18, South Zone (Hot Mold Department)

The first press identified as "Ott-4" needs to be corrected to "Ott-7".

Response to Comment 44:

IDEM, OAM agrees that this change should be made. The Technical Support Document (TSD) should also reflect these changes. However, the TSD is not physically changed after public notice. The changes are noted here in the Addendum to the Technical Support Document.

Comment 45:

TSD, Page 19, North Zone (Hot Mold Department)

The total captured VOC emissions needs to be corrected from "9.493" to "5.234".

Response to Comment 45:

IDEM, OAM agrees that this change should be made. The Technical Support Document (TSD) should also reflect these changes. However, the TSD is not physically changed after public notice. The changes are noted here in the Addendum to the Technical Support Document.

Comment 46:

TSD, Page 27, 326 IAC 8-1-6

Item (a) is not applicable and should be deleted. Refer to Item (e) which states that the #92 Padding Line NAVA Oven is not subject to 326 IAC 8-1-6 because 326 IAC 8-7 applies.

Item (b) should be corrected from "two (2) rollcoaters" to "three (3) reverse roll coaters".

Item (c) should be corrected from "rollcoters" to "roll coaters".

Item (d) should be corrected from "coating lines" to "coaters".

Item (e) should include Line 91 conventional oven because it is subject to 326 IAC 8-7 also. As Item (e) states, 326 IAC 8-1-6 would not be applicable since the Line 91 conventional oven is subject to 326 IAC 8-7. Accordingly item (f) should be deleted.

Response to Comment 46:

IDEM, OAM agrees that this change should be made. The Technical Support Document (TSD) should also reflect these changes. However, the TSD is not physically changed after public notice. The changes are noted here in the Addendum to the Technical Support Document.

Comment 47:

TSD, Page 28, 326 IAC 6-3-2

In the first paragraph, the word "overspray" needs to be deleted, as the particulate matter are emissions, not overspray.

Response to Comment 47:

IDEM, OAM agrees that this change should be made. The Technical Support Document (TSD) should also reflect these changes. However, the TSD is not physically changed after public notice. The changes are noted here in the Addendum to the Technical Support Document.

Comment 48:

TSD, Page 29 & 30, 326 IAC 6-2-2 and 326 IAC 6-2-4

Only the boilers were discussed as being applicable to these rules. In the permit application, Rieter Automotive identified oil heaters that are also applicable to these rules. Unless these oil heaters are considered by IDEM as an integral part of the process, Rieter Automotive believes that they should be included as applicable under these rules. Please note that FCU-10 was abandoned in place and FCU-11 should have been identified as 4.8 mmBtu/hr not 4.5 mmBtu/hr.

Response to Comment 48:

1. Condition D.1.2 "Particulate Matter" has been added to the final permit as follows. The remaining conditions of this section have been renumbered:

D.1.2 Particulate Matter (PM) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Emission Limitations for Facilities specified in 326 IAC 6-2-1(c)), the particulate matter emissions from the two (2) natural gas fired heaters with combined heat input capacity 12.0 mmBtu/hr are limited to 0.45 pounds per million British thermal units per hour (lb/mmBtu).

This limitation is based on the following equation:

$$Pt = 1.09 / Q^{0.26}$$

Where:

Pt = Pounds of particulate matter emitted per million Btu heat input (lb/mmBtu).

Q = Total source maximum operating capacity rating in million Btu per hour (mmBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's operation permit application, except when some lower capacity is contained in the facility's operation permit; in which case the capacity specified in the operation permit shall be used.

2. Condition D.2.2 "Particulate Matter" has been added to the final permit as follows. The remaining conditions of this section have been renumbered:

D.2.2 Particulate Matter (PM) [326 IAC 6-2-2]

Pursuant to 326 IAC 6-2-2 (Emission Limitations for Facilities Specified in 326 IAC 6-2-1(a)), the particulate matter emissions from the one (1) 4.8 mmBtu/hr natural gas fired Line 2 oil heater shall be limited to 0.54 pounds particulate matter per million British thermal unit (lb/mmBtu).

This limit is based on the following equation:

$$Pt = 0.87 / Q^{0.16}$$

Where:

Pt = Pounds of particulate matter emitted per million Btu heat input (lb/mmBtu).

Q = Total source maximum operating capacity rating in million Btu per hour (mmBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's operation permit application, except when some lower capacity is contained in the facility's operation permit; in which case the capacity specified in the operation permit shall be used.

3. Condition D.3.2 "Particulate Matter" has been added to the final permit as follows. The remaining conditions of this section have been renumbered:

D.3.2 Particulate Matter (PM) [326 IAC 6-2-2]

Pursuant to 326 IAC 6-2-2 (Emission Limitations for Facilities Specified in 326 IAC 6-2-1(a)), the particulate matter emissions from the one (1) 4.8 mmBtu/hr natural gas fired Lines 6 & 7 oil heater shall be limited to 0.54 pounds particulate matter per million British thermal unit (lb/mmBtu).

This limit is based on the following equation:

$$Pt = 0.87 / Q^{0.16}$$

Where:

Pt = Pounds of particulate matter emitted per million Btu heat input (lb/mmBtu).

Q = Total source maximum operating capacity rating in million Btu per hour (mmBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's operation permit application, except when some lower capacity is contained in the facility's operation permit; in which case the capacity specified in the operation permit shall be used.

4. Condition D.4.2 "Particulate Matter" has been added to the final permit as follows. The remaining conditions of this section have been renumbered:

D.4.2 Particulate Matter (PM) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Emission Limitations for Facilities specified in 326 IAC 6-2-1(c)), the particulate matter emissions from the one (1) 6.0 mmBtu/hr natural gas fired Line 8 oil heater is limited to 0.42 pounds per million British thermal units per hour (lb/mmBtu).

This limitation is based on the following equation:

$$Pt = 1.09 / Q^{0.26}$$

Where:

Pt = Pounds of particulate matter emitted per million Btu heat input (lb/mmBtu).

Q = Total source maximum operating capacity rating in million Btu per hour (mmBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's operation permit application, except when some lower capacity is contained in the facility's operation permit; in which case the capacity specified in the operation permit shall be used.

5. Condition D.5.3 (now renumbered Condition D.5.2) "Particulate Matter" has been changed to be as follows:

D.5.32 Particulate Matter (PM) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Emission ~~Limitations~~ **Limitations** for Facilities specified in 326 IAC 6-2-1(c)), the **particulate matter emissions from the** one (1) 11.2 mmBtu/hr natural gas fired Line 92 boiler is limited to ~~0.50~~ **0.40** pounds per million British thermal units per hour (lb/mmBtu). This limitation is based on the following equation:

$$Pt = 1.09 / Q^{0.26}$$

Where:

Pt = Pounds of particulate matter emitted per million Btu heat input (lb/mmBtu).

Q = Total source maximum operating capacity rating in million Btu per hour (mmBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's operation permit application, except when some lower capacity is contained in the facility's operation permit; in which case the capacity specified in the operation permit shall be used.

6. Condition D.8.1 (now renumbered Condition D.7.1) "Particulate Matter" has been changed to be as follows:

D.87.1 Particulate Matter (PM) [326 IAC 6-2-2]

Pursuant to 326 IAC 6-2-2 (Emission Limitations for Facilities Specified in 326 IAC 6-2-1(a)), the **particulate matter emissions from the** one (1) 8.38 mmBtu/hr boiler shall be limited to ~~0.60~~ **0.54** pounds particulate matter per million British thermal unit (lb/mmBtu). This limit is based on the following equation:

$$Pt = 0.87 / Q^{0.16}$$

Where:

Pt = Pounds of particulate matter emitted per million Btu heat input (lb/mmBtu).

Q = Total source maximum operating capacity rating in million Btu per hour (mmBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's operation permit application, except when some lower capacity is contained in the facility's operation permit; in which case the capacity specified in the operation permit shall be used.

Comment 49:

TSD, Pages 31 to 35, Compliance Requirements

Item 1: Delete in entirety; see Comment 10

Item 2: Delete in entirety; see Comment 15

Page 32 of 35 is a duplicate of page 31 of 34; Delete page 32 of 35.

Item 3 is repeated, but in regards to Line 8; the numbering should be changed.

Item 3(b): Regarding Lines 6 & 7 - Delete in entirety; see Comment 20.

Item 3(b): Regarding Line 8 - Delete in entirety; see Comment 24.

Item 4(b): Delete in entirety; see Comment 32.

Response to Comment 49:

Upon further review, IDEM, OAM has determined that the emission units at the source are not subject to the requirements of 326 IAC 6-3-2 (Process Operations), rather, the emission units at the source should be subject to the requirements of 326 IAC 6-1-2(a) (Particulate Matter Emission Limitations). The allowable emission limitations are now considered to be below the applicability thresholds for compliance monitoring. Therefore, the compliance monitoring requirements for these emission units have been removed from the final permit.

IDEM, OAM agrees that the monitoring requirements should be deleted. The Technical Support Document (TSD) should also reflect these changes. However, the TSD is not physically changed after public notice. The changes are noted here in the Addendum to the Technical Support Document.

Comment 50:

TSD, Pages 15, 19, 20 and 21 of 34

Please correct the typos and errors noted on the attached four pages of the draft permit TSD.

Response to Comment 50:

IDEM, OAM agrees that this change should be made. The Technical Support Document (TSD) should also reflect these changes. However, the TSD is not physically changed after public notice. The changes are noted here in the Addendum to the Technical Support Document.

Comment 51:

In the Permit, in the table of contents, under C Source Operation Conditions, C.5 is listed twice. C.5 Asbestos Abatement Projects should be changed to C.6 Asbestos Abatement Projects.

Response to Comment 51:

IDEM, OAM agrees. The change is as follows:
C.56 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

Comment 52:

Section D.7 (page 49) covers a boiler, which is specifically identified as an insignificant activity, and listed as such both in this section and on Page 23 (item #1). This entire section of D.7 should be deleted.

Response to Comment 52:

The Title V Operating Permit rule requires that applications list all points of emissions (326 IAC 2-7-4 Permit Application) with additional provisions relating to insignificant and trivial activities (326 IAC 2-7-1 Definitions). The rule requires that the permit identify all applicable requirements (326 IAC 2-7-5 Permit Content). The OAM has included insignificant activities only as necessary to identify specific applicable requirements. There will be no changes to this section in the final permit due to this comment.

Comment 53:

Condition D.3.5, D.3.6 (Page 38), Condition D.4.6, Condition D.4.7 (Page 41), and Condition D.5.8 (Page 45) concern the particulate matter operation requirement for the baghouses. They were included under the Compliance Monitoring Section and should have been included under the Compliance Determination Section.

Response to Comment 53:

IDEM, OAM agrees, the conditions shall be moved to the Compliance Determination Section and the corresponding changes to the table of contents shall be made. The Technical Support Document (TSD) should also reflect these changes. However, the TSD is not physically changed after public notice. The changes are noted here in the Addendum to the Technical Support Document.

Upon further review, OAM has made the following changes to the final Part 70 permit:

1. The second paragraph on the cover page has been changed to be as follows:

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and ~~326 IAC 2-1-3.2~~ as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

2. The name in the signature block on the cover page has been changed from "Felicia R. George" to "**Janet G. McCabe**".
3. Condition B.1 "Permit No Defense" has been changed to be as follows:

B.1 Permit No Defense ~~[326 IAC 2-1-10]~~ [IC 13]

-
- (a) Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7.
 - (b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with ~~326 IAC 2-1-3.2~~ or 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled "Permit Shield."

4. Condition B.10(a) "Annual Compliance Certification" has been changed to be as follows:
 - (a) **Where specifically designated by this permit or required by an applicable requirement, any** Any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
5. Condition B.13(e) "Emergency Provisions" has been changed to be as follows:
 - (e) IDEM, OAM may require that the Preventive Maintenance Plans required under 326 IAC ~~2-7-4-(c)(9)~~ **2-7-1(c)(10)** be revised in response to an emergency.
6. Condition B.14(h) "Permit Shield" has been changed to be as follows:
 - (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM has issued the modification. ~~[326 IAC 2-7-12(b)(8)]~~ **[326 IAC 2-7-12(b)(7)]**
7. Condition B.18(b)(1)(B) "Permit Renewal" has been changed to be as follows:
 - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM on or before the date it is due. ~~[326 IAC 2-5-3]~~
8. Condition B.25 "Transfer of Ownership or Operation" has been deleted from the final permit and replaced with the following:

~~B.25 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-7-11]~~

~~Pursuant to 326 IAC 2-1-6 and 326 IAC 2-7-11:~~

- ~~(a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch, within thirty (30) days of the change. Notification shall include a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the Permittee and the new owner.~~
- ~~(b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11. The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~
- ~~(c) IDEM, OAM shall reserve the right to issue a new permit.~~

B.25 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

**Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015**

The application which shall be submitted by the Permittee does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]**

9. Condition C.1 “Particulate Matter Emission Limitations for Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour” has been deleted from the final permit as follows. The remaining conditions of this section have been renumbered:

~~C.1 — Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]~~
~~Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.~~

10. Condition C.2 (now renumbered Condition C.1) “Opacity” has been changed to be as follows:

C.21 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (~~Visible Emissions~~ **Opacity** Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), ~~visible emissions~~ **opacity** shall meet the following, unless otherwise stated in this permit:

- (a) ~~Visible emissions~~ **Opacity** shall not exceed an average of forty percent (40%) ~~opacity~~ in ~~twenty-four (24) consecutive readings~~ **any one (1) six minute averaging period**, as determined in 326 IAC 5-1-4.
- (b) ~~Visible emissions~~ **Opacity** shall not exceed sixty percent (60%) ~~opacity~~ for more than a cumulative total of fifteen (15) minutes (sixty (60) readings **as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor**) in a six (6) hour period.

11. Condition C.10 (now renumbered Condition C.9) “Compliance Monitoring” has been changed to be as follows:

C.409 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee may extend **the** compliance schedule an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

12. The first sentence of Condition C.15 (now renumbered Condition C.14) "Risk Management Plan" has been changed to be as follows:

If a regulated substance, subject to 40 CFR 68, is present ~~in a process~~ **at a source** in more than ~~the a~~ threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

13. Condition C.21 (now renumbered Condition C.20) "General Reporting Requirements" has been changed to be as follows:

C.2420 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Semi-Annual Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported. **The Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).**
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:
- Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM on or before the date it is due.
- (d) Unless otherwise specified in this permit, any semi-annual report shall be submitted within thirty (30) days of the end of the reporting period. **The reports do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).**
- (e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports. **The Emergency/Deviation Occurrence Report does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).**
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

~~The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~

14. Condition D.1.2 (now renumbered Condition D.1.3) "Testing Requirements" has been changed to be as follows:

D.1.23 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing ~~at any specific time~~ when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the Particulate Matter (PM) limits specified in Conditions D.1.1 and D.1.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

15. Condition D.3.4 "Preventive Maintenance Plan" has been deleted from the final permit as follows. The remaining conditions of this section have been renumbered:

~~D.3.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]~~

~~A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.~~

16. Condition D.4.3 "Preventive Maintenance Plan" has been deleted from the final permit as follows. The remaining conditions of this section have been renumbered:

~~D.4.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]~~

~~A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.~~

17. Condition D.4.4 "Testing Requirements" has been changed to be as follows:

D.4.4 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing ~~at any specific time~~ when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the Particulate Matter (PM) and Volatile Organic Compound (VOC) limits specified in Conditions D.4.1, D.4.2 and D.4.3 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

18. Condition D.5.2 "Volatile Organic Compound" has been deleted from the final as follows. The remaining conditions of this section have been renumbered:

~~D.5.2 Volatile Organic Compound (VOC) [326 IAC 8-7]~~

~~Pursuant to 326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark and Floyd Counties), affected facilities shall achieve an overall VOC reduction of at least eighty-one percent (81%) from baseline actual emissions with the documented reduction in use of VOC containing materials or install an add-on control system that achieves an overall control efficiency of eighty-one percent (81%).~~

19. Condition D.5.4 "Preventive Maintenance Plan" has been added to the final permit as follows. The remaining conditions of this section have been renumbered:

D.5.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and their control devices.

20. Condition D.5.9 "Volatile Organic Compound" has been deleted from the final permit as follows.
The remaining conditions of this section have been renumbered:

~~D.5.9 Volatile Organic Compound (VOG)~~

~~Pursuant to 326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark, and Floyd Counties), the thermal incinerator shall be in operation at all times the NAVA oven is in operation.~~

21. Condition D.5.14 (now renumbered Condition D.5.11) "Reporting Requirements" has been changed to be as follows. Also a quarterly report has been added to the final permit:

~~D.5.14~~ **D.5.11 Natural Gas Fired Boiler Certification Reporting Requirements**

- (a) An annual certification for the 11.2 million British thermal units per hour natural gas fired Line 92 boiler shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the Natural Gas Fired Boiler Certification form located at the end of this permit, or its equivalent, no later than April 15 of each year.
- (b) **A quarterly summary of the information to document compliance with Condition D.5.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.**

22. Condition D.6.1 "Volatile Organic Compound" has been changed to be as follows:

~~D.6.1~~ **D.6.1 Volatile Organic Compound (VOC) [326 IAC 8-9]**

Any change or modification to the liquid organic storage tank area or the ~~foam Cell Injection Molding~~ **Chemical Storage Tanks in the Foam Cell Injection Molding** must be approved by the Office of Air Management (OAM) before such change or modification can occur.

23. Condition D.6.2 "Testing Requirements" has been changed to be as follows:

~~D.6.2~~ **D.6.2 Testing Requirements [326 IAC 2-7-6(1), (6)] [326 IAC 2-1.1-11]**

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing ~~at any specific time~~ when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

24. Condition D.8.2 (now renumbered Condition D.7.2) "Testing Requirements" has been changed to be as follows:

~~D.8.2~~ **D.7.2 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]**

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing ~~at any specific time~~ when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the Particulate Matter (PM) limit specified in Condition D.7.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

The following changes to the Technical Support Document (TSD) should be noted:

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (1) Exemption (no number), issued April 3, 1981.
- (2) **Operation Permit (OP 05-91-0460), issued November 30, 1987.**

- ~~(2)~~**(3)** Operation Permit (OP 45-12-85-0373), issued February 15, 1982.
- ~~(3)~~**(4)** Registration (no number), issued July 24, 1985.
- ~~(4)~~**(5)** Exemption (CP 089-4282), issued on January 1, 1995.
- ~~(5)~~**(6)** Exemption (CP 089-4301), issued on February 17, 1995.
- ~~(6)~~**(7)** Registration (CP 089-4461), issued on May 23, 1995, amended (A089-4642) on August 28, 1995.
- ~~(7)~~**(8)** Exemption (CP 089-4718), issued on August 23, 1995.
- (9) Registration (CP 089-4719), issued September 26, 1995.**
- ~~(8)~~**(10)** Registration (CP 089-4774), issued on November 6, 1995.
- (11) Registration (CP 089-4717), issued December 1, 1995.**
- ~~(9)~~**(12)** Registration (CP 089-4720), issued on February 2, 1996.
- ~~(10)~~**(13)** Construction Permit (CP 089-5604), issued on July 30, 1996, amended (A089-7997) on February 10, 1997.
- ~~(11) Construction Permit (CP 089-6837), issued on December 23, 1996.~~
- ~~(12)~~**(14)** Registration (CP 089-8167), issued on May 5, 1997.
- ~~(13)~~**(15)** Exemption (CP 089-8353), issued on July 8, 1997.
- ~~(14)~~**(16)** Exemption (CP 089-9217), issued on May 22, 1998.
- (17) Registration (CP 089-9967), issued November 28, 1998.**

All conditions from previous approvals were incorporated into this Part 70 permit except the following:

- (1) Construction Permit (CP 089-5604), issued July 30, 1996.**

Operation Condition 3: The use of #1 diesel fuel shall be limited to 1199 gallons per month. This limitation is equivalent to NO_x and VOC emissions of 12.0 tons per year and 1.0 ton per year, respectively, from the fire pump. Potential NO_x and VOC emission from all other existing facilities within the last five years are 12.6 tons per year and 23.7 tons per year respectively. Therefore, the Emission Offset rules, 326 IAC 2-3, will not apply.

Operation Condition 4: A log of information necessary to document compliance with operation condition no. 3 shall be maintained. These records shall be kept for at least the past 24 month period and made available upon request to the Office of Air Management (OAM). A quarterly summary shall be submitted to:

**Compliance Data Section
Office of Air Management
100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015**

within 30 days after the end of the quarter being reported in the format attached.

Reason not incorporated: This facility has been designated as an insignificant activity pursuant to 326 IAC 2-7-1(21)(G)(xxii)(CC) and 326 IAC 2-7-1(21)(G)(iii)(AA). Therefore, record keeping and reporting are no longer required.